



Wakefield Grammar School Foundation

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Author / Lead / Job Title	Steve Hasswell, Facilities Manager
Consultation	Vicky Weeks, Compliance Manager
Checker Person Name / Title Quality Assurance	Jenny Cocker, Director of Finance and Operations
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CHANGE RECORD - 1 Year Review Period

Version	Date	Change details
V1.04	Feb 2024	Review, K Oliver
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V1.06	Feb 2026	Updated in line with the ISBA Model CCTV Policy, V Weeks

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WGSF CCTV Policy

1. Purpose of Policy

Wakefield Grammar School Foundation (WGSF) uses CCTV cameras to view and record pupils, parents, staff and visitors on and around our premises. We recognise that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with data protection laws.

The purpose of this policy is to:

- Outline why and how we will use CCTV, and how we will process personal data recorded by CCTV cameras;
- Ensure that the legal rights of our pupils, residents, parents, staff and visitors relating to their personal data are recognised and respected; and
- Assist staff in complying with relevant legal obligations when working with personal data.

A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

The CCTV system is administered and managed by the Foundation, which is the controller in respect of personal data collected by our CCTV cameras. If you have any questions about this policy, please contact the Facilities Manager.

This policy has been drafted in compliance with the requirements of the General Data Protection Regulation (GDPR) and [guidance from the Information Commissioner's Office \(ICO\)](#). The system is registered with the Information Commissioner's Office (ICO).

This policy should be read with reference to the Foundation's [Data Protection Policy and Privacy Notices](#). The Foundation will review the ongoing use of existing CCTV cameras regularly to ensure that their use remains necessary and appropriate, and that the system is continuing to address the needs that justified its introduction.

2. Objectives of the System

The Foundation's purposes for using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the Foundation believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety and to act as a deterrent against crime.
- To protect the Foundation's buildings and equipment, and the personal property of pupils, parents, staff and visitors from damage, disruption, vandalism and other crime.
- To prevent and detect crime, and support law enforcement bodies in the prevention, detection and prosecution of crime as well as the identification and apprehension of offenders.
- To monitor the security and integrity of the Foundation's site and deliveries and arrivals.
- To monitor staff and contractors when carrying out work duties..

- To monitor and uphold discipline among pupils in line with the Behaviour Management Policy and School Rules (an appendix to the policy) and the [Foundation's Exclusions \(permanent\) and Required Removal Policy](#).
- To assist in day-to-day management, including ensuring the health and safety of pupils, parents, staff and visitors.
- To assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.
- To assist in civil litigation, including employment tribunal proceedings.

Please note that this list is not exhaustive and other purposes may become relevant from time to time.

3. Positioning

Locations for the CCTV cameras have been selected, both inside and outside our premises, that the Foundation reasonably believes require monitoring to address the above objectives.

Adequate signage has been placed in prominent positions around the premises to inform pupils, parents, staff and visitors that they are entering a monitored area, identifying the Foundation as the controller operating the CCTV system and including contact details for further information regarding the CCTV system.

These locations have been chosen to minimise viewing of spaces not relevant to the legitimate purposes of the Foundation's monitoring. As far as practically possible, CCTV cameras will not focus on private property; and no images of public spaces will be captured except to a limited extent at site entrances. In addition, surveillance systems will not be used to record sound and no images will be captured from areas in which individuals would have a heightened expectation of privacy, including medical, changing and washroom facilities.

4. Maintenance

The CCTV system will be operational 24 hours a day, every day of the year.

Authorised personnel will check and confirm that the CCTV system is properly recording and that cameras are functioning correctly, on a regular basis.

The CCTV system will be checked and (to the extent necessary) serviced no less than annually by appropriate staff or contractors.

5. Supervision

We will ensure that recorded images are only viewed by approved members of staff whose roles require them to have access to such data. This may include security, HR and safeguarding / pastoral staff. Staff using the CCTV system will be given appropriate training to ensure that they understand and observe the legal requirements related to the processing of relevant data.

Images will only be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

6. Storage

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered by CCTV cameras is stored in a way that maintains its integrity and security. Given the large amount of data generated by the CCTV system, we may store video footage using a cloud storage system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards. We may also engage data processors to process data on our behalf.

We will ensure appropriate contractual safeguards are in place to protect the security and integrity of the data.

Images will be stored for 30 days and permanently removed unless the Foundation considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required to retain such data (for example, by an appropriate third party such as the police or local authority).

Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and our Data Protection Policy.

7. Request for Disclosure

Individuals have the right to request access to personal data that the Foundation holds about them (otherwise known as a “subject access request”, about which please see the Foundation’s Data Protection Policy for further information), including information collected by the CCTV system, if it has been retained.

In order to respond to a subject access request, the Foundation will require specific details before properly responding, including (as a minimum) the:

- Time;
- Date;
- Camera location; and
- Why the requester would like to view it

This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

The Foundation must also be satisfied as to the identity of the person wishing to view stored images and the legitimacy of their request.

No images from our CCTV cameras will be disclosed to a third party without express permission being given by the Foundation. The following are examples of circumstances in which the Foundation may authorise disclosure of CCTV images to third parties:

- Where required to do so by the police or any relevant local or statutory authority;
- To make a report regarding suspected criminal behaviour or a safeguarding incident;
- To enable the Designated Safeguarding Leads or their deputies to examine pupil behaviour which may give rise to any reasonable safeguarding concern;
- To assist the Foundation in establishing facts in cases of unacceptable pupil behaviour, in which case, the pupil’s parents will be informed as part of the School’s management of a particular incident;

- To individual data subjects (or their legal representatives) pursuant to a subject access request (as outlined above);
- To the Foundation's insurance company where required in order to pursue a claim (for example for damage to insured property); or
- In any other circumstances required under law or regulation.

Where images are disclosed, a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).

The Foundation reserves the right to obscure images of third parties when disclosing CCTV footage, where we consider it necessary to do so.

8. Complaints and Queries

Any complaints or queries in relation to the Foundation's CCTV system, or its use of CCTV, should be referred to the Director of Finance and Operations.

For any other queries concerning the use of your personal data by the Foundation, please see the Foundation's applicable Privacy Policy on the [website](#).