



Wakefield Grammar School Foundation

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VALIDITY – Policies should be accessed via FireFly to ensure the current version is used.

CHANGE RECORD - 1 Year Review Period

Version	Date	Change details
V1.00	Aug 2018	New Policy, D Cowderoy
V1.01	July 2018	Policy Updated, S Williams-McGlone/D Cowderoy
V1.02	Mar 2019	Updated, S Williams-McGlone/D Cowderoy/A Casey
V1.03	Nov 2020	Review, K Oliver, L Perry
V1.04	Feb 2024	Review, K Oliver

To be published on the following:

Staff shared	X	School website	X
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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 Estates Manager.

This policy has been drafted in compliance with the requirements of the General Data Protection Regulation (GDPR).

The system is registered with the Information Commissioner's Office (ICO).

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.
- To protect the Foundation's buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in 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 if required and where necessary to review recordings of their activities where breaches of discipline may be suspected as part of a wider disciplinary or grievance investigation and where it is reasonably considered that CCTV images may assist with such investigation or are in the legitimate business interest.
- It is not an objective to routinely monitor discipline among pupils but the system may be used to assist an investigation into a pupil disciplinary matter in line with the schools' Behaviour policies, which are on the [website](#) and upon request.

- 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.

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 and Supervision of the System

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 the in-house IT team.

5. Operation of the System

Estates staff and Administrative staff in the Senior School Offices will review the live images during the day.

They 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 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 of Data

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 computing 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. Access to Images

Individuals have the right to request access to personal data that the Foundation holds about them (otherwise known as a “subject access request”, on which please see the Privacy Notice and 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 appointed 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/guardian 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).

When considering disclosure of CCTV footage, the Foundation reserves the right to:

- Obscure images of third parties;
- Invite the requester to view the images in our offices;
- Limit the number of viewings; and/or
- Refuse a request to view CCTV images where we consider it necessary to do so

8. Other CCTV systems

The Foundation does not own or manage third party CCTV systems, but may be provided by third parties with images of incidents where this is in line with the objectives of the Foundation's own CCTV policy.

The Foundation may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the Foundation's management of a particular incident.

9. Complaints and Queries

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

This policy should be read in conjunction with the Foundation's Privacy Notices and Data Protection Policy available on the [WGSF website](#).

10. Policy Review

The Foundation's use of CCTV and the content of this policy shall be reviewed annually by the Estates Manager with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

Appendix 1

CCTV FOOTAGE ACCESS REQUEST

The following information is required before the Foundation can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV Footage may contain the information of others that needs to be protected, and that the Foundation deletes CCTV recordings after 30 days.

Name and address: (Proof of ID may be required)	
Description of footage (Including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	
Why are you requesting to view this footage?	

Signature*

Print Name.....

Date.....

***NB if requesting CCTV footage of a child under 12, a person with parental responsibility should sign this form. For children over that age, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to parent(s) outweigh the privacy consideration for the child.**