

## Close Circuit Television “CCTV” Policy

### Policy Statement

Wingate School uses Close Circuit Television (“CCTV”) within the premises of the School. The purpose of this policy is to set out the position of the school in respect to the management, operation and use of the **CCTV** on the school premises.

This policy applies to all members of our staff, visitors to the school premises (including parents and guardians) and all other persons whose images may be captured by the **CCTV** system. This policy takes account of all applicable legislation and guidance, including:

1. General Data Protection Regulation (“**GDPR**”)
2. Data Protection Act 2018 (together with the Data Protection Legislation)
3. CCTV Code of Practice produced by the Information Commissioner
4. Human Rights Act 1998

### Purpose of CCTV

Wingate School uses **CCTV** for the following purposes:

1. To provide a safe and secure environment for pupils, staff and visitors
2. To prevent the loss of or damage to the School buildings and/or assets
3. To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

### Description of system

The CCTV system in use at the school consists of seven fixed cameras. These are situated at each entrance point to the main school buildings and the Sixth Form Building.

### Siting of Cameras

**CCTV** cameras are sited in such a way as to meet the purpose for which the **CCTV** is being operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors. Cameras will not be sited, wherever possible, in such a way as to record areas that are not intended to be the subject of surveillance. The school will make all reasonable efforts to ensure that areas outside of the School premises are not recorded.

Signs will be erected to inform individuals that they are in an area within which **CCTV** is in operation.

Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

### Privacy Impact Assessment

Prior to the installation of any **CCTV** camera, or system, a privacy impact assessment will be conducted by the school to ensure that the proposed installation is compliant with legislation..

The school will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

## Management and Access

The **CCTV** system will be managed by the installation company Tenerife-IT and the School Bursar. On a day to day basis the **CCTV** system will be operated by the School Office receptionists. The viewing of live **CCTV** images will be restricted to members of staff in the School Office.

Recorded images which are stored by the **CCTV** system will be restricted to access by the Data Protection Officer (DPO), Head of Wingate School and /or the School Bursar and Tenerife - IT. No other individual will have the right to view or access any **CCTV** images unless in accordance with the terms of this policy as to disclosure of images.

## Storage and Retention of Images

Any images recorded by the **CCTV** system will be retained for as long as necessary for the purpose for which they were originally recorded i.e. 2 weeks, unless there is a specific purpose for which they are retained for a longer period. Data is captured on an independent hard drive and is not linked to the internet. Stored data is overwritten after 2 weeks unless it needs to be retained (as above).

The school will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

The **CCTV** recording systems being located in restricted access areas

The **CCTV** system being encrypted/password protected

Restriction on the ability to make copies

A log of any access to the **CCTV** images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the School Office.

## Disclosure of Images to Data Subjects

Any individual recorded in any **CCTV** image is a data subject for the purposes of the **Data Protection Legislation**, and has a right to request access to those images. This can be requested in writing to the Data Protection Officer "DPO" or Head.

When such a request is made the DPO, Head of Wingate School and/or School Bursar will review the **CCTV** footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The DPO, Head of Wingate School and/or School Bursar must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the school must consider whether:

- the request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals
- the other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained

If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- a. when the request was made

- b. the process followed by the DPO, Head of Wingate School and/or School Bursar in determining whether the images contained third parties
- c. the considerations as to whether to allow access to those images
- d. the individuals that were permitted to view the images and when
- e. whether a copy of the images was provided, and if so to whom, when and in what format

### **Disclosure of Images to Third Parties**

Wingate School will only disclose recorded **CCTV** images to third parties and law enforcement agencies where it is permitted to do so in accordance with the Data Protection Legislation.

If a request is received from a law enforcement agency for disclosure of **CCTV** images then the DPO, Head of Wingate School and/or School Bursar must follow the same process as above in relation to subject access requests. Details should be obtained from the law enforcement agency as to exactly what they want the **CCTV** images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

If an order is granted by a Court for disclosure of **CCTV** images then this should be complied with. However, careful consideration must be given to exactly what the Court order requires. If there are any concerns as to the disclosure then the DPO should be contacted at [protecciondedatos@wingateschool.com](mailto:protecciondedatos@wingateschool.com) in the first instance and appropriate legal advice may be required.

### **Review of Policy and CCTV System**

This policy, the **CCTV** system and the privacy impact assessment relating to it will be reviewed annually.

### **Misuse of CCTV Systems**

The misuse of a **CCTV** system could constitute as a criminal offence. Any member of staff who breaches this policy may be subject to disciplinary action.

### **Complaints Relating to this Policy**

Any complaints relating to this policy or to the **CCTV** system operated by the School should be made in accordance with the School Complaints Policy.

Mr Martyn Howells

Head of Wingate School

August 2022