



# WRIGHT ROBINSON COLLEGE

## CCTV POLICY

### **General Data Protection Regulation**

This policy is drafted in accordance with the requirements of the General Data Protection Regulation (GDPR) and will come into effect on 25 May 2018.

Reviewee: Victoria Duffy

Reviewed: April 2018

# CCTV POLICY

## 1 Policy Statement

Wright Robinson College uses Close Circuit Television (CCTV) within its premises. The purpose of this policy is to set out the position of the Wright Robinson College as to the management, operation and use of the CCTV at the Wright Robinson College.

This policy applies to all pupils, members of our Workforce, visitors to the college premises and all other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- General Data Protection Regulation (GDPR)
- Data Protection Act 2018\* (pending government approval- currently DPA 1998)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

## 1 Purpose of CCTV

The Wright Robinson College uses CCTV for the following purposes:

- a) To provide a safe and secure environment for pupils, staff and visitors
- b) To prevent the loss of or damage to the Wright Robinson College buildings and/or assets

## 2 Description of system

192 cameras split across 3 floors and 5 colour zones. The cameras can only record visuals, not sound. They are fixed cameras. (See Annex A and Annex B for a list of camera positions).

## 3 Siting of Cameras

All CCTV cameras are sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, pupils and visitors.

CCTV operation posters are clearly sited around the building.

Cameras are not sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Cameras are located in college toilets, but only viewing the sink and door area (CCTV in operation posters are displayed).

Wright Robinson College will make all reasonable efforts to ensure that areas outside of the Wright Robinson College premises are not recorded.

## 4 Privacy Impact Assessment

Prior to the installation of any additional/new CCTV camera, or system, a privacy impact assessment will be conducted by the Wright Robinson College to ensure that the proposed installation is compliant with legislation and ICO guidance.

The Wright Robinson College 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.

## 5 Management and Access

The CCTV system will be managed by the Headteacher, Mr Haworth (Deputy Headteacher) and Mrs Shaw (Headteacher's PA & facilities liaison).

The viewing of live CCTV images will be restricted to the Senior Leadership, Pastoral Team, School-based Police Officer and Community Team.

Recorded images which are stored by the CCTV system will be restricted to access by the Headteacher and Mr Haworth. 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.

The CCTV system is checked weekly by Mr Haworth to ensure that it is operating effectively

## 6 Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a period of 14 days unless there is a specific purpose for which they are retained for a longer period.

Wright Robinson College 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:

- CCTV recording systems being located in restricted access areas;
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to specified members of staff

A termly 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 Wright Robinson College.

## 7 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.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Wright Robinson College's Subject Access Request Policy.

When such a request is made Mr Haworth 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. Mr Haworth will take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the Wright Robinson College must consider whether:

- i. The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- ii. 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:

- When the request was made;
- The process followed by Mr Haworth in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- Whether a copy of the images was provided, and if so to whom, when and in what format.

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

Wright Robinson College will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images then Mr Haworth will follow the same process as above in relation to subject access requests. Detail 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.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

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

This policy will be reviewed annually.

The CCTV system and the privacy impact assessment relating to it will be reviewed annually.

## **10 Misuse of CCTV systems**

The misuse of CCTV system could constitute a criminal offence.

Any member of staff who breaches this policy may be subject to disciplinary action.

## **11 Complaints relating to this policy**

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

## CCTV PRIVACY IMPACT ASSESSMENT TEMPLATE

1 Who will be captured on CCTV?

Pupils, staff, third party contracted staff, parents/carers, volunteers, Governors and other visitors including members of the public etc.

2 What personal data will be processed?

Full Image, behaviour

3 What are the purposes for operating the CCTV system? Set out the problem that the Wright Robinson College is seeking to address and why the CCTV is the best solution and the matter cannot be addressed by way of less intrusive means.

To provide a safe and secure environment for pupils, staff and visitors  
To prevent the loss of or damage to the Wright Robinson College buildings and/or assets

4 What is the lawful basis for operating the CCTV system?

Legitimate interests of the organisation to maintain health and safety

5 Who is/are the named person(s) responsible for the operation of the system?

Senior Leadership, Pastoral Team, School-based Police Officer and Community Team.

6 Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;
- b. siting of the cameras and why such locations were chosen;
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and
- e. whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

- a. The system was chosen as it was suitable (images are clear enough for the purpose required) and one of the best available on the market at the time.
- b. Cameras were sited to cover corridors, walkways and areas where Health & Safety should be monitored.
- c. Cameras were placed in communal areas.
- d. Posters are located in key exits/entrances (reception, pupil entrance, community entrance) to ensure that persons are informed of the CCTV system upon entering the building.
- e. The system does not allow third party redaction (i.e. blurring of images).

7 Set out the details of any sharing with third parties, including processors

Police and subject access requests.

8 Set out the retention period of any recordings, including why those periods have been chosen

14 days

9 Set out the security measures in place to ensure that recordings are captured and stored securely

The CCTV system is located in the Comms Room, which is a locked/secure room. Monitors for the system are located in offices which are locked by staff.

10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

- Individuals are recorded in line with the college policy.
- Access is limited to the staff detailed in the policy and the recordings stored securely.

11 What measures are in place to address the risks identified?

*\*see number 9\**

12 Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

The system has been in situ since 2007 when the college opened and parents are aware via the college Behaviour Policy that Wright Robinson College operates a CCTV system on the premises.

13 When will this privacy impact assessment be reviewed?

Summer 2019.

**Approval:**

This assessment was approved by the Data Protection Officer:

DPO: *Victoria Duffy*

Date: April 2018

## Annex A- Camera Positions

| <b>Wright Robinson College - Camera Positions</b> |       |              |
|---|-------|--------------|
| <b>Unit 1</b>                                     |       |              |
| Camera Numbers                                    | Zone  | Position     |
| No 1 - 14.  | Lilac | Ground Floor |
| No 15 - 16.                                       | Lilac | First Floor  |

| <b>Unit 2</b>  |       |              |
|----------------|-------|--------------|
| Camera Numbers | Zone  | Position     |
| No 1 - 9       | Lilac | First Floor  |
| No 10 - 16     | Lilac | Second Floor |

| <b>Unit 3</b>  |       |              |
|----------------|-------|--------------|
| Camera Numbers | Zone  | Position     |
| No 1           | Lilac | Second Floor |
| No 2 - 12      | Red   | Ground Floor |
| No 13 - 16     | Red   | First Floor  |

| <b>Unit 4</b>  |      |              |
|----------------|------|--------------|
| Camera Numbers | Zone | Position     |
| No 1 - 6       | Red  | First Floor  |
| No 7 - 16      | Red  | Second Floor |

| <b>Unit 5</b>  |       |              |
|----------------|-------|--------------|
| Camera Numbers | Zone  | Position     |
| No 1 - 10      | Green | Ground Floor |
| No 11 - 16     | Green | First Floor  |

| <b>Unit 6</b>  |       |              |
|----------------|-------|--------------|
| Camera Numbers | Zone  | Position     |
| No 1 - 9       | Green | Second Floor |
| No 10 - 16     | Green | Third Floor  |

| <b>Unit 7</b>  |       |              |
|----------------|-------|--------------|
| Camera Numbers | Zone  | Position     |
| No 1 - 4       | Green | Third Floor  |
| No 5 - 15      | Blue  | Ground Floor |
| No 16          | Blue  | First Floor  |

| <b>Unit 8</b>  |      |              |
|----------------|------|--------------|
| Camera Numbers | Zone | Position     |
| No 1 - 8       | Blue | First Floor  |
| No 9 - 16      | Blue | Second Floor |

| <b>Unit 9</b>  |        |              |
|----------------|--------|--------------|
| Camera Numbers | Zone   | Position     |
| No 1 - 13      | Yellow | Ground Floor |
| No 14 - 16     | Yellow | First Floor  |

| <b>Unit 10</b> |          |              |
|----------------|----------|--------------|
| Camera Numbers | Zone     | Position     |
| No 1 - 4       | Yellow   | First Floor  |
| No 5 - 15      | Yellow   | Second Floor |
| No 16          | External | Quad         |

| <b>Unit 11</b> |                   |              |
|----------------|-------------------|--------------|
| Camera Numbers | Zone              | Position     |
| No 1 - 6       | Blue              | Ground Floor |
| No 7 - 13      | Blue              | Ground Floor |
| No 14 - 16     | Blue Second Floor |              |

| <b>Unit 12</b> |          |              |
|----------------|----------|--------------|
| Camera Numbers | Zone     | Position     |
| No 1 - 4       | Blue     | Second Floor |
| No 5           | Red      | Ground Floor |
| No 7 - 8       | Green    | Refectory    |
| No 9 - 12      | External | Quads        |
| No 13 - 14     | Red      | Reception    |
| No 15 - 16     | External | Car Park     |