



CCTV Policy

This policy refers to both Wellington Senior School and Wellington Prep School

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Website	Yes

1. Purpose and Scope

Wellington School uses CCTV cameras to view and record individuals on and around the School site in order to maintain a safe environment for pupils, staff and visitors, and to protect school property. This policy relates to the use and management of CCTV throughout the school premises and should be read alongside the School's Data Protection Policy and Retention of Records Policy.

Wellington School recognises that the images of individuals recorded by CCTV cameras are personal data which must be processed in accordance with applicable Data Protection Legislation (as defined below) as well as the Information Commissioner's Office (ICO) CCTV guidance relating to the use of video surveillance. As a data controller, we have notified our use of personal data (which includes CCTV) with the ICO and seek to comply with its best practice guidance.

The purpose of this policy is to:

- outline why and how we will use CCTV, and how we will process data recorded by CCTV cameras;
- ensure that the legal rights relating to personal data, are recognised and respected;
- assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence; and
- explain how to make a subject access request in respect of personal data created by CCTV.

This policy does not form part of any contract of employment or other contract to provide services, and the School may amend it at any time.

Wellington School takes compliance with this policy very seriously. Failure to comply puts at risk the individual's whose information is being processed, carries the risk of significant civil and criminal sanctions for the individual and for the School, and may, in some circumstances, amount to a criminal offence by the individual. As a result, breach of this policy may be treated as a disciplinary matter and, following investigation, may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

2. Definitions

For the purposes of this policy, the following terms have the following meanings:

- **Biometric Data:** means personal data resulting from specific technical processing relating to the physical, physio-logical or behavioural characteristics of a natural person, which allow or confirm the unique identification of that natural person, such as facial images or dactyloscopic (fingerprint) data, as defined at Article 4(14) UK GDPR.
- **CCTV:** means fixed and domed cameras designed to capture and record images of individuals and property both indoors and outdoors.
- **Data:** is information which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screen shots.
- **Data subjects:** means all living individuals about whom we hold personal information as a result of the operation of our CCTV (or other surveillance systems).
- **Personal data:** means data relating to a living individual who can be identified from that data (or other data in our possession). This will include video images of identifiable individuals.
- **Data controllers:** are the people who, or organisations which, determine the manner in which any personal data is processed. They are responsible for establishing practices and policies to ensure compliance with the law. We are the data controller of all personal data used in our School for our own purposes.
- **Data users:** are those of our employees whose work involves processing personal data. This will include those whose duties are to operate CCTV cameras and other surveillance systems to record, monitor, store, retrieve and delete images. Data users must protect the data they handle in accordance with this policy and our Data Protection Policy.
- **Data processors:** are any person or organisation that is not a data user (or other employee of a data controller) that processes data on our behalf and in accordance with our instructions (for example, a supplier which handles data on our behalf).
- **Data Protection Legislation:** means the Retained Regulation (EU) 2016/679, the UK General Data Protection Regulation (**UK GDPR**) and the Data Protection Act 2018 (**DPA 2018**), and related laws including but not limited to, the Human Rights Act 1998.

- **Processing:** is any activity which involves the use of data. It includes obtaining, recording or holding data, or carrying out any operation on the data including organising, amending, retrieving, using, disclosing or destroying it. Processing also includes transferring personal data to third parties.
- **Surveillance systems:** means any devices or systems designed to monitor or record images of individuals or information relating to individuals. The term includes CCTV systems as well as any technology that may be introduced in the future that capture information of identifiable individuals or information relating to identifiable individuals.

3. Reasons for the use of CCTV

Wellington School has considered and determined that the purposes for which CCTV is deployed are legitimate, reasonable, appropriate and proportionate. For ease of reference, CCTV systems are deployed around the School site on the legal basis set out in our Privacy Notices and its purpose is in order to:

- deter crime and assist in the prevention and detection of crime and/or serious breaches of policies and procedures;
- protect our buildings and assets from damage, disruption, vandalism and other crime;
- assist with the identification, apprehension and prosecution of offenders;
- for the personal safety of our pupils, staff, visitors and other members of the public;
- assist in day-to-day management, including ensuring the health and safety of our staff and others; and
- assist internal investigations.

This list is not exhaustive and other purposes may be or become relevant from time to time.

The CCTV system will not be used:

- to record sound unless in accordance with the policy on covert recording (see below)
- to capture images from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities;
- for any automated decision taking; or
- for monitoring private and/or residential areas or premises.

Before installing and using CCTV systems on our premises, the School has:

- assessed and documented the appropriateness of and reasons for using CCTV;

- established and documented who is responsible for day-to-day compliance with this policy; and
- ensured signage is displayed to inform individuals that CCTV is in operation, and that CCTV operations are covered in appropriate policies.

The School keeps a record of the CCTV installed and used.

Once installed, reviews will be regularly undertaken to ensure that the use of CCTV systems and the processing of personal data obtained through it remains justified.

4. Monitoring

Locations for the CCTV cameras have been selected, both inside and out of the buildings across the Campus, that the School reasonably believes require monitoring to address the above objectives. It is operational 24 hours a day, every day of the year, and this data is continuously recorded.

A list of the cameras currently used on the campus is attached at Appendix 1.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

CCTV may be installed both indoors and outdoors including in corridors and common rooms as appropriate.

Surveillance systems will not be used to record sound.

Images are monitored by authorised personnel and those personnel using surveillance systems are given appropriate training to ensure they understand and observe the legal requirements related to the processing of video and images captured by CCTV on site.

1. How we will operate any CCTV

Where CCTV cameras are placed in the workplace, the School will ensure that signs are clearly displayed in the vicinity of the cameras to alert individuals that their image may be recorded. The CCTV signs will state:

- that the School is responsible for CCTV recording;

- the legal purpose(s) of the CCTV recording and how recording may be used;
- how long recordings will be kept;
- that individuals can access recordings; and
- contact details for queries regarding the CCTV scheme.

Live feeds from CCTV cameras will only be monitored where this is reasonably necessary, for example to protect health and safety.

The School will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters. Recorded images will only be viewed in designated, secure offices.

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.

2. Data and Image Retention

Images and recording logs must be retained and disposed of in accordance with the School's Data Protection Policy and Retention of Records Policy. Images stored on removable media will similarly be erased or destroyed once the purpose of the recording is no longer relevant. Data will only be retained for legal and/or compliance reasons in accordance with the relevant Data Protection Policy and Retention of Records Policy.

In order to ensure that your rights are protected, the School will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

Given the large amount of data generated by surveillance systems, the School may store video footage using a cloud computing system. The School will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.

The School may engage data processors to process data on our behalf. The School will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

5. Retention and erasure of data gathered by CCTV

The day-to-day management of images will be the responsibility of the Campus Team.

Images will be stored for up to 6 weeks and automatically overwritten unless the School considers it reasonably necessary to retain the images for the pursuit of the objectives outlined above, or if lawfully required to retain such data by an appropriate third party such as the Police or Local Authority.

Where a specific incident is reported and footage of the incident is captured on the CCTV system the footage will be saved for as long as it is required, up to a period of 7 years.

Where personal data collected by the CCTV system is retained, it will be held in accordance with data protection law and the School's Data Protection Policy and Retention of Records Policy.

Information including the date, time and length of the recording, as well as the locations covered and individuals recorded, will be noted in the system logbook.

6. Use of additional surveillance systems

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, we will carefully consider if they are appropriate and may carry out a data privacy impact assessment (**DPIA**).

A DPIA is intended to assist us in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

Any DPIA will consider the nature of the problem that we are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, we will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

The School will confine CCTV to areas where expectations of privacy are low. No surveillance cameras will be placed in areas where there is an increased expectation of privacy (for

example, in changing rooms or toilets) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns. In this situation we will always complete a DPIA and have regard to it before deciding whether to proceed.

7. Covert monitoring

Covert monitoring means monitoring carried out in a manner calculated to ensure those subject to it are unaware that it is taking place.

We will never engage in covert monitoring or surveillance unless, in very limited and highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or serious malpractice is taking place within the workplace and, after suitable consideration (including the completion of a DPIA), we reasonably believe there is no less intrusive way to tackle the issue. If necessary, we will only undertake covert recording in accordance with the Data Protection Laws and ICO guidelines.

In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of Head following receipt of advice from our Director of Operations. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision. The School's Director of Operations will have regard to the completed DPIA when making their decision.

Only limited numbers of people will be involved in any covert monitoring as necessary.

Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity. Its use should be immediately stopped when that specific investigation has been completed. Any decision to use covert surveillance for any reason must be fully documented and records of such decision retained securely.

8. Other CCTV systems

8.1 The School 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 School's own CCTV policy and/or its rules under the Promoting Good Behaviour and/or Exclusions Policy.

8.2 Many pupils travel on School minibuses or on coaches provided by third party contractors and a number of these vehicles are equipped with CCTV systems. The School may review footage from School minibuses or request images from the coach companies in order to establish facts in cases of unacceptable pupil behaviour, in which case the parents/guardian will be informed as part of the School's management of a particular incident.

9. Requests for disclosure

No images from our CCTV cameras will be disclosed to any third party, without express permission being given by the Director of Operations or Estates Manager.

Internal requests should be made using the online request form, available in hard copy from the Campus office or online on Firefly. See Appendix 2 for details.

Data will not normally be released to external parties unless satisfactory evidence is given that it is lawful to do so, e.g. when it is required for legal proceedings or under a court order. In such cases a Request Form must be completed and authorised by the Director of Operations or the Estates Manager. A copy of the relevant form is attached at Appendix 3

In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

We will maintain a record of all disclosures of CCTV footage, including the location to which the footage is being transferred to (if footage/images are being removed from the CCTV system), any crime incident number (if applicable) and the signature / written confirmation of receipt of the person to whom the images have been transferred. See Appendix 4 for a copy of the Request log.

No images from CCTV will ever be made public (including posting online) or disclosed to the media.

10. Subject access requests

Data subjects, including staff, may make a request for disclosure of their personal information and this may include CCTV images (**subject access request**). A subject access request should be made in writing in accordance with our Data Protection Policy and Staff Privacy Notice (available within the Staff Handbook) and it will be handled in line with data protection law and our applicable policies and procedures.

In order for us to locate relevant footage, any requests for copies of recorded CCTV images should normally include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual (e.g. what they were wearing).

We may be required or permitted to obscure images of third parties (i.e. other individuals) when disclosing CCTV or other footage as part of a subject access request. We may also offer for you to view the footage on school premises if appropriate.

If we cannot comply with the request, the reasons for not being able to comply will be documented and the data subject will be advised of these in writing.

11. Requests to prevent processing

We recognise that, in certain circumstances, we may be required to stop processing personal data, if an individual requests it. Under data protection law individuals also have other legal rights with respect to their data as listed and set out in our Staff Privacy Notice. For further information regarding this, please contact our Director of Operations.

12. Complaints

If you have any concerns about our use of CCTV, you should speak to the Director of Operations in the first instance. Where this is not appropriate, or matters cannot be resolved informally, you should use the School's formal Grievance Procedure (available on Firefly or in hard copy from the Main Reception).

If you are not satisfied with the response received, you are entitled to contact the ICO. Details of how to do this can be found on the ICO website: www.ico.org.uk.

13. Enforcement and Compliance

All authorised users of our surveillance technology and its underlying data are required to adhere to the controls around the use of CCTV as set out in this policy and as may be advised separately from time to time. The use of the CCTV systems for any other purpose other than those specifically authorised will be subject to a full investigation and could lead to disciplinary action up to and including dismissal without notice.

APPENDIX 1: LIST OF ALL CCTV CAMERA LOCATIONS

Prep - Side Gate
Prep - Side Road
Prep - Main Gate
Prep - Rear Gate
Prep - Carpark
Boys Changing 02
Group Study 01
Group Study 02
Dukes IT Suite 01
Dukes IT Suite 02
Boys Changing 03
Coggan IT Suite 01
Girls Changing 01 – Corner Building
Boys Changing 01 – Corner Building
Sports Hall 01
High Performance 02
PRSC Foyer
High Performance 01
PRSC Reception
PRSC Corridor 02
ARC Corridor 01
PRSC Corridor 01
ARC Foyer
ARC Corridor 02
Sports Hall 02
PRSC Gym
Beech Entrance
Science Entrance
Senior Reception
Outside Climbing Wall
Workshop
Quad
Southside Gate
Southside Driveway
Grange Driveway
Prep School Main Gate
Northside Gate
Senior School Main Gate
PRSC Car Park
6th Form Ground Floor
6th Form Entrance
Grange Entrance
Willows 01
Willows 02
Lights Entrance
Overside Entrance
Prep Driveway
Great Hall Foyer
Grounds Entrance

Northside 02
Northside 01
Science 01
Dukes 02
Science 02
PRSC Rear 01
Chapel Steps
Dukes Pond
PC Block 01
Health Centre 01
LS Common Room
Avenue Rear 01
PC Block 02
PC Block 03
Science U-S Corridor
Coggan IT Suite 02
Upper School Common Room
Quad 02
ARC Minibuses
Bulford 01
Astro 01
School Field Pavillion
Dukes Stairwell

APPENDIX 2:

WELLINGTON SCHOOL

CCTV FOOTAGE – INTERNAL ACCESS REQUEST

The following information is required before the School 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 school typically deletes CCTV recordings automatically after 4 weeks.

Name and Department:

(proof of ID may be required)

Reason for request.....

Description of footage:

(including a description of yourself, clothing, activity etc.)

Location of camera(s)

Date and approximate time of footage sought

Signature*

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, 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 the parent(s) outweigh the privacy considerations of the child.**

APPENDIX 3:

WELLINGTON SCHOOL

CCTV FOOTAGE – EXTERNAL ACCESS REQUEST

The following information is required before the School 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 school typically deletes CCTV recordings automatically after 4 weeks.

Name and Address:

(proof of ID may be required)

Reason for request.....

Description of footage:

(including a description of yourself, clothing, activity etc.)

Location of camera(s)

Date and approximate time of footage sought

Signature*

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, 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 the parent(s) outweigh the privacy considerations of the child.**

Appendix 4

CCTV Footage Access Request Log

Date	Requested by (name)	Reason for request	Received by (signature) & Location sent to	Crime Number (if applicable)	Authorised by (signature)