



CCTV Policy

Riverside International School

Challenge – Community – Care

Document Control

Version	Reviewed	Next Review	Description	Approved by
v1.0	June 2025	June 2026	CCTV Policy	Management Board

Introduction

At Riverside School currently we use CCTV cameras to view and record individuals around our premises in order to help us maintain a safe and secure environment. This policy is intended to address concerns that individuals may have about the effect of filming on their privacy and to provide reassurance about the safeguards we have in place.

Images recorded by the CCTV cameras are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring the privacy rights of staff, students and visitors are recognised and respected.

Scope

This policy applies to all staff, students, contractors, third parties including external providers and visitors at Riverside o.p.s. (hereinafter referred to as “School” and “we”, “our”, “us”), Roztocká 43/9, 160 00 Praha 6, IČO 26203812, more precisely all Riversides’ locations in the area of Prague 6. Riverside is in the position of a Data Controller for the personal data collected by the CCTV system.

Responsible Personnel

The Management Board is responsible for the overall operation of this policy and for ensuring compliance with the relevant legislation. Day-to-day management and responsibility for deciding what information is recorded, how it will be used and to whom it will be disclosed has been delegated to the Co-Directors. Operational responsibility for the cameras and the storage of data is the responsibility of the Facility Manager. The responsibility for ensuring this policy is kept up to date has been delegated to the Data Protection Team led by the Data Protection Officer (DPO). You can contact our DPO by emailing timeapiskackova@riversideschool.cz if you have any questions or concerns.

We engage Data Processors (TouchWARE s.r.o., Sokolovská 385/200, 180 00 Prague 8, DIČ CZ26185351 and DUX Praha s.r.o., Legerova 1335/2, 120 00 Prague 2, IČO 25650815) to process data on our behalf. We ensure the necessary contractual safeguards are in place to protect the security and integrity of the data.

Reasons for the use of CCTV

We currently use CCTV around our sites for the following purposes:

- for the security and personal safety of staff, students, visitors and other members of the public and to act as a deterrent against crime;
- to prevent and detect crime and to protect buildings and assets from damage, disruption, vandalism and other crime;
- to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- to assist in the defence of any civil litigation, including employment proceedings;
- to prevent extraordinary events and gather materials for solving insurance claims;
- to assist in day-to-day management, ensuring the health and safety of staff, students, visitors and other members of the public.

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

We consider the use of CCTV to be in our legitimate interests to protect property and to maintain the safety of individuals.

Recipients of Personal Data

Personal Data may be transferred to the following recipients:

- to law enforcement agencies or authorities active in misdemeanour proceedings in case of extraordinary events;
- insurance companies in case of solving insurance claims;
- Data Subjects in case of their claims.

Location of Cameras and System Operations

The location of each camera is carefully chosen so that it will only monitor the area relevant for the intended purpose and to ensure that it is not positioned in an area where there is an expectation of privacy (e.g. changing rooms and toilets).

The current locations of our CCTV cameras are as follows:

- The exterior of the Early Years building, including the main entrance: in total 9 cameras;
- The exterior of the Primary School buildings, including the main and secondary entrances in these locations: in total 43 cameras;
- The exterior of the Junior High building, including the main entrance: in total 6 cameras;
- The interior of the Primary School, Riverview building, the locker room: in total 3 cameras;
- The interior of the Junior High building, the locker room: in total 2 cameras.

Our cameras are not used to record sound but are in operation 24 hours a day, 365 days a year.

We ensure that signs are displayed in a prominent area adjacent to the surveillance zone to alert individuals that their image may be recorded.

Images collected by the CCTV are viewed in secure offices by authorised members of staff and the Data Processors whose role requires them to have access to the data. This may include HR staff involved with disciplinary or grievance matters.

No automated decision-making, including profiling, is performed.

Storage of Data

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data. Images recorded by the CCTV are only stored locally on the CCTV servers.

Data Retention

Images will be automatically deleted after 14 days with the possibility to extend the retention period to three weeks during the holidays, unless the images are required as evidence or for a purpose stated above which requires a longer retention period, in which case the images will be deleted once that purpose has been fulfilled.

Once the purpose for holding the images has been fulfilled, all images will be erased permanently and securely. Any physical matter, such as still photographs, hard copy prints, tapes or discs, will be disposed of as confidential waste.

Management of CCTV

Prior to the introduction of CCTV cameras, we carefully consider where they are placed and what data they will capture by carrying out a Data Protection Impact Assessment (DPIA). This process is intended to assist us in deciding whether the cameras are necessary and proportionate in the circumstances.

Review of CCTV use

We ensure that the use of our existing CCTV cameras is reviewed periodically, and at least on an annual basis, to ensure that the images are clear and high quality. We also ensure that their use remains necessary and appropriate, and that we are continuing to address the needs that justified the camera's initial introduction.

Requests for disclosure

We may allow appropriate law enforcement agencies to view or remove CCTV footage where this is required for the detecting or prosecution of crime. We may also release CCTV footage to a third party where it is required for legal proceedings or has been requested by way of a court order.

We maintain a record of all disclosures of CCTV footage. We do not post images captured on CCTV online or disclose them to the media.

Subject Access Requests (SARs)

Individuals may make a request for the disclosure of their personal data and this may include CCTV images. Information about how to exercise this, and other rights, can be found in the Data Protection Policy.

To enable us to locate relevant footage, any requests for recorded CCTV must include the date and time of the recording, the location of where the footage was captured and, if necessary, information identifying the individual concerned.

We reserve the right to obscure images of third parties when disclosing CCTV images as part of a subject access request, in all cases where we consider it necessary to do so.

In addition to the right to make a SAR, Data Subjects have a right to erase or restrict processing of their personal data (except extraordinary events), right to object or lodge a complaint with the supervisory authority.