

# CCTV POLICY

## 1. Ownership and Management

The Wallace Collection operates a CCTV surveillance system ("the system") at Hertford House. The system is owned by the Wallace Collection and managed by the Security Department. The Security Manager serves as the Senior Controller, responsible for overall system management and oversight.

## 2. Compliance with Data Protection Laws

CCTV footage that captures identifiable individuals is classified as personal data and is covered by the Data Protection Act. The Trustees of the Wallace Collection are the registered data controllers under the terms of the Act. The Data Protection Officer for the Collection is responsible for ensuring compliance with the Act.

This policy should be read alongside the Collection's Data Privacy Notice.

This policy aligns with the Information Commissioner's CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.

## 3. Purpose of CCTV System

The primary purpose of the CCTV system is to support crime prevention, public safety, property security, and staff monitoring. Specifically, the system helps:

- Maintain public safety
- Secure property and premises
- Prevent and investigate crime
- Monitor staff activities

The system may capture images of staff, visitors, suspected offenders, and others in or around the premises. Where necessary, information may be shared with individuals, employees, service providers, police, courts, security agencies, or persons making a legitimate inquiry. The Wallace Collection acknowledges the potential impact on privacy and operates the system with sensitivity.

Full details of the Collection's data protection registration are available on the Information Commissioner's Office website.

## 4. System Description

The CCTV system is designed to capture clear and usable images for the above-stated purposes. Cameras are strategically positioned at key locations, including perimeter points, building entrances, exits, and public and non-public spaces. Prominent signage informs staff, visitors, and the public that CCTV is in operation and provides contact information for further inquiries.

## 5. System Operation

CCTV images are recorded continuously and monitored by 'operators' from the Control Room and the Security Manager's office. Access to these areas is strictly controlled. Security staff assigned to the Control Room are trained to handle CCTV footage with care and discretion. The Senior Controller ensures that all authorised personnel are fully trained in system operations. Detailed operational procedures are outlined in the Security Standard Operating Procedures (SOPs).

The CCTV system has been designed to ensure maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

## 6. Data Retention and Management

CCTV footage is retained for a maximum period of 33 days, after which it is deleted unless required for ongoing investigations. The system ensures that stored information is accurate and updated as needed for reference purposes.

## 7. Access to CCTV Footage

Access to recorded images is limited to authorised personnel in accordance with this policy, the SOPs, and applicable law. Any access to or disclosure of footage is logged in the Security CCTV Viewing Log.

Disclosure of images to third parties is restricted to situations that are in accordance with the system's purposes and comply with the Data Protection Act.

Individuals can request access to footage involving themselves under a Subject Access Request. They may also request corrections or deletions of inaccurate data. All such requests should be sent to [security@wallacecollection.org](mailto:security@wallacecollection.org) or addressed to the Security Manager at the following address:

Security Manager  
The Wallace Collection  
Manchester Square  
London W1U 3BN

## 8. Covert Recording

Covert surveillance is only permissible under exceptional circumstances involving specific criminal activity. It requires written authorisation from the Security Manager, Director of Finance & Resources, and, where staff are involved, the Head of Human Resources. Such surveillance is only conducted where informing the individual(s) concerned would undermine the investigation. Authorisations are reviewed every 28 days, and all decisions are fully documented and securely stored.

## 9. Feedback and Complaints

Members of the public can address concerns or complaints regarding CCTV use to [security@wallacecollection.org](mailto:security@wallacecollection.org) or via telephone at 020 7563 9500. Collection staff should raise concerns through their line manager.

## 10. Annual Policy Review

This policy is reviewed annually by the Audit Committee to ensure its continued relevance and compliance with legal requirements.

This document is managed by the Security Department.

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[wallacecollection.org](http://wallacecollection.org)