

THE MILL HILL SCHOOL FOUNDATION

Closed Circuit Television Policy (CCTV)

Key Points of the CCTV Policy

Purpose	To regulate the management and operation of the CCTV System and ensure compliance with Data Protection legislation.
Objectives if the CCTV System.	These Objectives are set out in Clause 5.1 of this Policy. The Foundation considers that these purposes are all in its legitimate interests.
CCTV System	This means the Closed Circuit Television Systems deployed across the Foundation
Maintenance	The Estates Manager is responsible for the maintenance of the CCTV System.
Storage	The Foundation Manager is responsible for the storage of the data from the CCTV System.
Image Requests by Employees relating to Pupils or Security	Employees who wish to access data on the CCTV System relating to Pupils of the Foundation or the Security of the Foundation in connection with the Objectives must complete the Form in Appendix 1 hereto and send it to the Estates Manager at cctv@millhill.org.uk for authorisation.
CCTV Data Access Requests	Individuals who wish to exercise their right to access the personal data the Foundation holds on them should complete the Form set out in Appendix 2 hereto and send it to the Compliance Manager at compliance@millhill.org.uk .

The above key points are a synopsis and are not intended to replace the policy. The full policy must be read and followed in the event it needs to be applied. If the Key Points are found to be in conflict with the wording of the full policy, the policy takes priority.

Key Personnel

Estates Manager	Bernard Crouch	cctv@millhill.org.uk
Compliance Manager	Maxine Zeltser	compliance@millhill.org.uk
HR Manager	Wayne Coomey	hr@millhill.org.uk
Foundation Network Manager	Adam Banks	
Heads	Jane Sanchez	Mill Hill School
	Leon Roberts	Belmont School
	Sarah Bellotti	The Mount, Mill Hill
	International	
	Kate Simon	Grimsdell School
Designated Safeguarding Leads (DSL)	James Dickin	Mill Hill School
	Paul Symes	Belmont School
	Sarah Proudlove	The Mount, Mill Hill
	International	
	Jen Ticehurst	Grimsdell School
Head of Boarding	John Taylor	
Director of MHSF Enterprises	Adele Greaves	
Commander, Combined Cadet Force (CCF)	Anthony Norrington	

1. Definitions

The Foundation: means the Mill Hill School Foundation which comprises Mill Hill School, The Mount, Mill Hill International, Belmont School (the preparatory school) and Grimsdell School (the pre-preparatory school). It is a registered charity and a company limited by

11. Other CCTV systems

The Foundation 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 Foundation's own CCTV policy.

Many pupils travel to the schools of the Foundation on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The Foundation may use these in establishing facts in cases of unacceptable pupil behaviour, in which case the pupils' parents/guardian will be informed as part of the Foundation's management of a particular incident.

Access requests by pupils or their parents for CCTV footage on coaches must go through the Compliance Manager.

12. Thermographic Cameras

Due to the threat of Covid 19, the Foundation has installed a Thermographic Camera at the entrance to the main reception of Belmont School and MMHI. There have also been six of these installed at MHS on various entrances as well as the use of a hand held Thermographic Cameras at the Estates Office, Belmont MHS reception and Grimsdell to monitor the temperature of pupils, contractors, staff and visitors. Only the live images produced by such Cameras will be viewed and such images will not be stored unless the camera recognises an issue with the individual temperature. Where there is an issue with the temperature of an individual, the image of the individual will be emailed to the nominated person for the relevant School. This image will be deleted after one day.

The Foundation may wish to install/use further Thermographic Cameras at other locations across the Foundations. Such Cameras will be used on the same basis as above.

13. Complaints and queries

Any complaints or queries in relation to the Foundation's CCTV system, or its use of CCTV, or requests for copies of this Policy, should be referred to the Compliance Manager by email at compliance@millhill.org.uk.

14. Review

The operation of this Policy will be reviewed every two years. **Approved by the Foundation's Estates Committee on 27/07/20**

APPENDIX 1 CCTV FOOTAGE EMPLOYEE REQUEST FORM relating to a Foundation Pupil or the Security of the Foundation

The following information is required before the Foundation can provide copies of or access to CCTV footage to Employees following a request relating to a Foundation Pupil or the Security of the Foundation. Such access will only be granted if it is required to further the Objectives set out in Clause 5.1 of the CCTV Policy.

If a Foundation Employee wishes to view CCTV images pursuant to their right to access personal data that the Foundation holds on them, then the Employee should complete a CCTV Footage Data Access Request form as set out in Appendix 2 of the CCTV Policy.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the CCTV System works on a continuous loop depending on quality of image and data storage size which means that, after a period images, may be recorded over.

Name and Position:	
Reason for Request :	
Description of footage (including a description of yourself, clothing, activity etc.):	
Location of camera:	
Date of footage sought:	
Approximate time (give a range if necessary):	

Signature.....

Print Name.....

Date

Counter signature : _____ (This Form must be countersigned by the Head of the School(or their Deputy) or a DSL (or their Deputy) or the DFR or the CEO).

Print Name: _____

Position: _____

Date: _____

The completed form must be sent to the Estates Manager on cctv@millhill.org.uk

APPENDIX 2

CCTV FOOTAGE DATA ACCESS REQUEST

from individuals wishing to exercise their right to view data relating to themselves pursuant to the Foundation's Data Protection Policy

The following information is required before the Foundation 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 CCTV System works on a continuous loop depending on quality of image and data storage size which means that, after a period, images may be recorded over.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.):	
Location of camera:	
Date of footage sought:	
Approximate time (give a range if necessary):	
Have you attached the consent of any person/ child whose image or personal data may appear in the requested footage?*	

Signature.....

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 12, a person with parental responsibility should sign this form. For children 12 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

Regulations for the Access to Live or Recorded CCTV Images pursuant to clause 8 of the CCTV Policy

Those Employees granted access to live or recorded CCTV Images pursuant to Clause 8 of the CCTV Policy will abide by the following regulations:

1. Only to access the CCTV Images on a Foundation computer or device.
2. Not to download the CCTV Images nor take screenshots of such Images.
3. Ensure that the CCTV Images are not stored on their computer or device.
4. Not to take a photograph of the CCTV Images displayed on their computer or device.
5. When viewing the live or recorded CCTV Images, to ensure that no unauthorised person can see the images.
6. To ensure that any screens showing live CCTV Images are not visible by pupils; unauthorised employees; parents; visitors or members of the public.

7. Ensure that screens displaying CCTV Images are never left unattended and are switched off when not in use.
8. Ensure that they have read the provisions of the CCTV Policy

Instilling values, inspiring minds
millhill.org.uk



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