



Mill Hill

Instilling values, inspiring minds

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Mill Hill School Foundation CCTV Policy

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 A 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 B 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 Leon Roberts Sarah Bellotti Kate Simon	Mill Hill School Belmont School The Mount, Mill Hill International Grimsdell School
Designated Safeguarding Leads (DSL)	James Dickin Paul Symes Sarah Proudlove Jen Ticehurst	Mill Hill School Belmont School The Mount, Mill Hill International Grimsdell School
Head of Boarding	John Taylor	
Director of MHSF Enterprises	Adele Greaves	
Commander, Combined Cadet Force (CCF)	Anthony Norrington	

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1. Definitions

1.1 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 guarantee, employing both teaching and non-teaching staff. Legal responsibility rests with the company acting by the Court of Governors, the Chief Executive Officer (CEO) and the Heads of each school who have day to day responsibility for the management of their schools and the care of their pupils

1.2 Data Protection Law

This refers to all relevant legislation including the Data Protection Act 1998 and related statutory instruments (until 25 May 2018); The General Data Protection Regulation (EU 2016/679) from 25 May 2018 and The Data Protection Act 2018 and related legislation from 25 May 2018.

2. Purpose

The purpose of this Policy is to regulate the management and operation of the centralised Closed Circuit Television Systems (CCTV System) deployed across the Foundation and to ensure compliance with Data Protection Law.

This Policy also serves as a notice and guide to data subjects (including pupils, parents, staff, volunteers, visitors to the Foundation and members of the public) regarding their rights in relation to personal data recorded via the CCTV.

3. Management Responsibility

Legal responsibility for CCTV sits with the Foundation. The CCTV System is administered and managed by the Foundation, which acts as the Data Controller. CCTV operations are managed day to day by the Estates Manager on behalf of the Foundation.

This policy will be subject to review from time to time, and should be read with reference to the Foundation's Data Protection Policy (which can be found on the Foundation's website). [For further guidance, please review the Information Commissioner's CCTV Code of Practice.]

4. CCTV Cameras

All fixed and Pan Tilt and Zoom (PTZ) cameras are in plain sight on Foundation premises and the Foundation does not routinely use CCTV for covert monitoring and does not monitor private property. However, CCTV may be used to monitor public rights of way on the Foundation grounds where this may impact on the safety and/or security of the Foundation and/or its users and covert cameras may be installed in accordance with Clause 5.2 below.

5. CCTV Purpose

The Foundation's purposes for using the CCTV System are set out below and, having fully considered the privacy rights of individuals, the Foundation believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose or released without an approved and authorised Request in the appropriate form set out in the Appendices hereto

5.1 Objectives of the CCTV System

- To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the Foundation buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.
- To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.
- To monitor the security and integrity of the Foundation site.
- To monitor and uphold discipline among pupils in line with the Foundation policies.

5.2 Camera Positioning

- The Location of CCTV cameras have been selected by the Estates Manager in consultation with each Head of School on the basis such location is reasonably required to be monitored to address the Objectives stated in Clause 5.1 above.
- No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities. However, where behaviour or activities in a sensitive area contravene or are expected to contravene Foundation Policies or the Law, CCTV cameras (visible or covert) may be deployed for a time limited period only and only with the **written agreement** of the relevant School Head, along with details as to who will be authorised to view the images.
- In line with the Boarding Schools: National Minimum Standards (2015), the Foundation will ensure that any use of CCTV cameras does not intrude unreasonably with the privacy of pupils who are boarding.

5.3 Installation

The installation or use of any fixed video cameras/recording devices is prohibited unless the prior written approval of the Director of Operations or the Estates Manager has been obtained.

5.4 Signage

Adequate signage has been placed in prominent positions to inform staff, pupils and visitors that they are entering a monitored area.

6. Maintenance

The CCTV System will be operational 24 hours a day, every day of the year. The Estates and the Foundation Network Manager or their nominated representative, will check and confirm that the CCTV System is properly recording and that cameras are functioning correctly. The CCTV System will be serviced annually. The Foundation is currently updating its CCTV system and until this is complete there may be some CCTV cameras which are not fully operational.

7. Supervision of the System

Only staff or contractors authorised by the Director of Operations, Estates Manager or the Foundation Network Manager can conduct routine supervision of the CCTV System. Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

8. Access to CCTV Images

Only the Director of Operations, Estates Manager and Foundation Network Manager and those authorised by them will supervise and have access to the whole of the Foundation's CCTV System. The Foundation's CCTV System has been separated into various sub-divisions. The Foundation recognises that some of its Employees will need to view live and/or recorded images from a specific sub-division for the better performance of their role. All such Employees must comply with the Regulations set out in Appendix C. The Employees who have been allowed such access are:

Name/Role	View Live Images	View Recorded Images	Download CCTV Images	Access to Cameras
Director of Operations	YES	YES	YES	All
Foundation Network Manager	YES	YES	YES	ALL
Estates Manager	YES	YES	YES	ALL
Designated Safeguarding Leads	YES	YES	NO	THEIR SCHOOL
Head of Boarding	YES	YES	NO	THE BOARDING HOUSES
House Masters/Parents	YES	YES	NO	THEIR BOARDING HOUSE
Deputy Heads	YES	YES	NO	THEIR SCHOOL
Reception	YES	YES	NO	THE RECEPTION AREA OF THEIR SCHOOL
Head of Sixth Form (MHS)	YES	YES	NO	MHS SIXTH FORM BLOCK
Head of Music (MHS)	YES	YES	NO	MHS MUSIC BLOCK

Enterprises Sports Centre Managers	YES	YES	NO	MHS SPORTS CENTRE
Commander, CCF	YES	YES	NO	CCF UNIT AND ARMORY

Access to live or recorded images may be granted to additional Employees but only with the prior written approval of the Director of Operations or Estates Manager and subject to such Employees complying with the Regulations set out in Appendix C.

9. Requests to View CCTV Images

Requests to view CCTV Images will be handled as follows:

9.1 Requests by Foundation Employees Relating to Pupils and Security of the Foundation

If a Foundation Employee requires to view stored CCTV images relating to Foundation Pupils and/or the Security of the Foundation in line with the Objectives specified in Clause 5.1, they must complete the Employee Request Form, as set out in Appendix A hereto. This form must be counter-signed by the Head of their School (or their Deputies) or the DSL of their School (or their Deputies) or the Director of Operations (DO) for support staff or the Chief Executive Officer (CEO). The form should then be sent to the Estates Manager by email at cctv@millhill.org.uk. Copies of this form are available on the Staff section of Firefly.

If the Request is to view images relating to another Employee, then the Estates Manager may seek the guidance of the Director of Operations or the HR Manager before authorising such request.

If the Estates Manager authorises the Request, access to the specified images will be given to the requesting Employee. Access will be arranged by the Estates Manager. The Estates Manager or his/her representative will be present whilst the CCTV images are being viewed.

Images will only be permitted to be viewed and/or monitored in a suitably secure and locked private area to minimise the likelihood of or opportunity for access to unauthorised persons.

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 must follow the procedure set out in Clause 9.2 below.

9.2 CCTV Data Access Requests by Individuals

Individuals have the right to access the personal data the Foundation holds on them (please see the Data Protection Policy which is on the Foundation website), including information held on the CCTV System, if it has not been recorded over. CCTV recording works on a continuous loop depending on quality of image and data storage size.

The Foundation will require specific written details including details of the person making the request, the reason for the request, the time and date required and camera location before it can consider and properly respond to any such requests. The information required is set out in the Form set out in Appendix B2 hereto. This information/form should be sent to the Compliance Manager by email at compliance@millhill.org.uk. A hard copy of this Form can be obtained from the School Office of each Foundation School.

If the Compliance Manager authorises the request, access to the specified images will be given to the requesting individual subject to the Exemptions specified in Clause 9.3 below. Access will be arranged by the Estates Manager. The Estates Manager or his/her representative will be present whilst the CCTV images are being viewed.

Images will only be permitted to be viewed and/or monitored in a suitably secure and locked private area to minimise the likelihood of or opportunity for access to unauthorised persons.

9.3 Exemptions

The authorisation of a Request set out in this Clause 9.2 above is subject to certain exemptions from access. Where other individuals are identifiable (this will include seeing their car registration number plates), it would not be possible for the Foundation to release footage without their formal written consent or the vehicles owner's consent. If the individual is requesting CCTV footage of a child under 12, a person with parental responsibility for them, must sign the Request Form. For children aged 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 data to the parent/s outweighs the privacy considerations of the child.

9.4 Authorisation of Request

In considering a request, the Estates Manager or Compliance Manager must satisfy themselves of the identity of any person wishing to view stored images and the legitimacy of the request. The following are examples when access to CCTV images may be authorised:

- Where required to do so by the Head, the Police or some relevant statutory authority;
- To make a report regarding suspected criminal behaviour;
- To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;
- To assist the Foundation in establishing 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;
- To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 9.2 above;
- To the Foundation's insurance company where required in order to pursue a claim for damage done to insured property; or
- In any other circumstances required under law or regulation.

Images will only be permitted to be viewed and/or monitored in a suitably secure and locked private area to minimise the likelihood of or opportunity for access to unauthorised persons.

10. Storage of Data

The day-to-day operational management of images will be the responsibility of the Estates Manager or such suitable person as the Estates Manager shall appoint in his or her absence.

Storage of data will be the responsibility of the Foundation Network Manager.

Images will be stored for a limited period of time and automatically over-written unless the Foundation considers it reasonably necessary for the pursuit of the Objectives outlined in Clause 5.1 above, or if lawfully required by an appropriate third party such as the police or local authority. The Foundation does not backup the CCTV footage which means that if the network video recorders (NVR) fail the footage will be lost. The Foundation will endeavour to mitigate this risk by situating the NVR in an air-conditioned room away from the site being monitored and by setting the NVR to alert on disc degradation.

Where such data is retained, it will be retained in accordance with the Data Protection Law and the Foundation's Retention of Records Policy, which can be found on the Foundation website. Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.

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 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

This Policy was approved by the Estates Committee of the Court of Governors: December 2020

Next Review : December 2022

APPENDIX A

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 B 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 B

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 C

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

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