



Mill Hill

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The Mill Hill Schools CCTV Policy 2023

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 Mill Hill Schools consider that these purposes are all in the Group's legitimate interests.
CCTV System	This means the Closed Circuit Television Systems deployed across the Mill Hill Schools.
Maintenance	The Estates Manager is responsible for the maintenance of the CCTV System.
Storage	The Estates Manager and Domestic Bursar are responsible for the storage of the data from the CCTV System.
Image Requests by Employees relating to Pupils or Security	<ul style="list-style-type: none"> Employees who wish to access data on the CCTV System relating to Pupils of the Mill Hill Schools in connection with the Objectives must complete the Form in Appendix A hereto and send it to the Designated Safeguarding Leads of their School or one of their deputies. Employees who wish to access data on the CCTV System relating to the Security of the Mill Hill Schools in connection with the Objectives must complete the Form in Appendix A hereto and send it to the Estates Manager or the Domestic Bursar at cctv@millhill.org.uk. Forms which are not countersigned as specified by Clause 9.1 will not be processed.
CCTV Data Access Requests	Individuals who wish to exercise their right to access the personal data the Mill Hill Schools 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.

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1. Definitions

1.1 The Mill Hill Schools

Means for the purposes of this Policy: Mill Hill School, Mill Hill International, Belmont School (the preparatory school) and Grimsdell School (the pre-preparatory school) which are members of the Mill Hill School Foundation trading as the Mill Hill Education Group (the Group). The Group is a registered charity and a company limited by guarantee, employing both teaching and non-teaching staff. Legal responsibility rests with the Group 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 Mill Hill Schools 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 Mill Hill Schools 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 Group. The CCTV System is administered and managed by the the Group, which acts as the Data Controller. CCTV operations are managed day to day by the Estates Manager on behalf of the Mill Hill Schools.

This policy will be subject to review from time to time and should be read with reference to the Group's Data Protection Policy (which can be found on the Group'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 Mill Hill Schools' premises and the Mill Hill Schools do not routinely use CCTV for covert monitoring and do not monitor private property. However, CCTV may be used to monitor public rights of way on the Mill Hill Schools' grounds where this may impact on the safety and/or security of the Mill Hill Schools and/or its users and covert cameras may be installed in accordance with Clause 5.2 below.

5. CCTV Purpose

The Mill Hill Schools' purposes for using the CCTV System are set out below and, having fully considered the privacy rights of individuals, the Mill Hill Schools believe these purposes are all in the Group's 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 Mill Hill Schools' 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 Mill Hill Schools' site.
- To monitor and uphold discipline among pupils in line with the Mill Hill Schools' 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 the Group's Policies or the Law, CCTV cameras (visible or covert) may be deployed 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 (2022), the Mill Hill Schools 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 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 Mill Hill Schools are 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, the Domestic Bursar or the Estates 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

Images from the CCTV System are stored on the CCTV Portal which is administered by the Domestic Bursar and the Estates Manager. Authorised Employees will either be given Site Viewer or Live View Only access. Site Viewer access will allow authorized users to archive footage on the CCTV Portal for a specified time period. Live View Only will allow authorized Employees 'view only' access to live footage. CCTV images are not downloadable onto individual devices.

Only the Director of Operations, Estates Manager and the Domestic Bursar and those authorised by them will supervise and have access to the whole of the Mill Hill Schools' CCTV System. The Mill Hill Schools' CCTV System has been separated into various sub-divisions. The Mill Hill Schools recognise that some of its Employees will need Site Viewer or Live View Only access to a specific sub-division of the CCTV Images 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	Site Viewer	Live- View Only	Access to Cameras
Director of Operations	YES	YES	All
Domestic Bursar	YES	YES	ALL
Estates Manager	YES	YES	ALL
Designated Safeguarding Leads and their Deputy Designated Safeguarding Leads	YES	YES	THEIR SCHOOL
Head of Boarding	YES	YES	THE BOARDING HOUSES
House Masters/Mistress	YES	YES	THEIR BOARDING HOUSE
Head of Sixth Form (MHS)	YES	YES	Cameras linked to the vape sensors in the MHS



			Sixth Form Block only
Sports Centre Operations and Events Manager and Sports Centre Lettings Manager	NO	YES	Swimming Pool; Sports Centre/Gym and Sports Hall
Sports Centre Duty Managers	NO	YES	Swimming Pool; Sports Centre/Gym and Sports Hall

Access to live or archived 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.

Employees will be required to attend training on Data Protection and CCTV Images before the access rights will be granted. Employees will then be required to update this training annually.

9. Requests to View CCTV Images

Requests to view CCTV Images will be handled as follows:

9.1 Requests by Mill Hill Schools' Employees Relating to Pupils and Security of the Mill Hill Schools

If a Mill Hill Schools Employee requires to view stored CCTV images relating to Mill Hill Schools Pupils 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 their Line Manager. The form should then be sent to the Designated Safeguarding Leads of their School or one of their deputies.

If a Mill Hill Schools Employee requires to view stored CCTV images relating to the Security of the Mill Hill Schools in connection with the Objectives specified in Clause 5.1, they must complete the Employee Request Form in Appendix A hereto and send it to the Estates Manager or the Domestic Bursar at cctv@millhill.org.uk. This form must be counter-signed by their Line Manager.

Copies of this form are available on the Staff section of Firefly. Requests which have not been countersigned will not be processed.

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

If the Request is authorised, secure access will be arranged by the relevant Designated Safeguarding Lead or one of their deputies or the Domestic Bursar or the Estates Manager, as appropriate. The Designated Safeguarding Lead or one of their deputies or the Domestic Bursar or 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 Mill Hill Schools Employee wishes to view CCTV images pursuant to their right to access personal data that the Mill Hill Schools 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 Mill Hill Schools holds on them (please see the Data Protection Policy which is on the Group 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 Mill Hill Schools 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 B 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 School.

If the Compliance Manager authorises the request, secure 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 Domestic Bursar or Estates Manager. The Domestic Bursar or 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 Mill Hill Schools 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 Compliance Manager must be satisfied 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 Mill Hill Schools in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardian will be informed as part of the Schools' 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 Group'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 Domestic Bursar and the Estates Manager or such suitable person as they shall appoint in their absence.

Storage of data will be the responsibility of the Domestic Bursar and the Estates Manager.

Images will be stored for a limited period of time and automatically over-written unless the Mill Hill Schools consider 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 Mill Hill Schools do not backup the CCTV footage which means that if the network video recorders (NVR) fail the footage will be lost. The Mill Hill Schools 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 Group's Retention of Records Policy, which can be found on the Group's 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 Group 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 Mill Hill Schools' own CCTV policy.

Many pupils travel to the schools of the Mill Hill Schools on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The Mill Hill Schools 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 Mill Hill Schools'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. Body Worn Cameras

Body Worn Cameras (BWC) are CCTV cameras attached to the uniforms of security staff. These cameras record both audio and visual footage. BWC can only be used with the approval of the Director of Operations and can only be worn to satisfy the Objectives in Clause 5.1 of this Policy.

Mill Hill Schools' security staff do not routinely wear BWCs. However, should there be a need for the use of BWC, it shall be managed by the Director of Operations. The Domestic Bursar shall be responsible for the use of BWC and for the training of staff in its use. All staff who may use BWC will have full training in their use. No staff will be permitted to use BWC until they have attended training and read and agreed to the provisions of this Clause and the Regulations in Appendix C of this Policy.

All incidents which involve the use of BWC shall be logged, documenting the date, time, reason for use, name of authorizer and name of the member of staff wearing the BWC. The member of staff wearing the BWC is always responsible for its use.

Before recording commences, staff wearing BWC should alert those present that the recording will be

taking place, stating the following:

- That recording is taking place;
- That this includes audio recording;
- Their own name and that of any colleagues;
- The date;
- The time;
- The location; and
- The nature of the incident.

If the recording has started prior to the arrival of the member of staff at the scene, they should state this upon their arrival. When this is not operationally possible, this should be provided as soon as it is practicable to do so.

The cameras shall be aimed at those involved in the incident and not at third parties who are not involved. Staff should do their best to ensure that those not involved in the incident are not recorded: this may include standing in a position to block them from being filmed or asking them to move. BWCs should never be used covertly or concealed.

Footage on the BWC will be retained until recorded over unless required for the purposes of an investigation. Only the Domestic Bursar shall be able to access the footage. Employees requiring to view the footage shall send the completed Employee Request Form to the Domestic Bursar on cctv@millhill.org.uk as per Clause 9.1 above. Other individuals wishing to access the footage as part of an Access Request should complete the Form in Appendix B and send it to the Compliance Manager on compliance@millhill.org.uk as per Clause 9.2 above.

1. Complaints and Queries

Any complaints or queries in relation to the Mill Hill Schools'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.

2. Review

This Policy was approved by the Estates Committee of the Court of Governors: December 2023

Next Review : December 2025

Appendix A: CCTV FOOTAGE EMPLOYEE REQUEST FORM

Relating to a Mill Hill Schools Pupil or the Security of the Mill Hill Schools

The following information is required before the Mill Hill Schools can provide access to CCTV footage to Employees following a request relating to a Mill Hill Schools Pupil or the Security of the Mill Hill Schools. 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 Mill Hill Schools Employee wishes to view CCTV images pursuant to their right to access personal data that the Mill Hill Schools 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 your Line Manager.

Print Name: _____

Position: _____

Date: _____

For Requests relating to pupils, the completed form must be sent to your School's Designated Safeguarding Lead or one of their Deputies. For Requests relating to Security, the completed form must be sent to the Domestic Bursar or 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 Group's Data Protection Policy

The following information is required before the Mill Hill Schools 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.**

The completed form must be sent to the Compliance Manager on compliance@millhill.org.uk

Appendix C: Regulations for those Employees with Site Viewer or Live View Only access to CCTV Images pursuant to this CCTV Policy

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

1. Only to access the CCTV Images on a Mill Hill Schools 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
9. Attend annual training on Data Protection and CCTV Images.
10. For those with Site Viewer access:
 - To blur/redact any images relating to pupils or third parties not the subject of the Request or which could identify such pupils or third parties eg car registration number plates;
 - To keep a record of each request including the date; name of requestor and a brief description of the Request.

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