



DATA PROTECTION - CCTV POLICY

1. Introduction

1.1 Dulwich College (the College) has in place a CCTV surveillance system ("the system") on the main College site. The main College site comprises for this purpose all the College's properties in Dulwich other than staff accommodation. The system is owned by Dulwich College, Dulwich Common, London SE21 7LD. (There is also CCTV at the College's boat house in Putney. That is covered by separate arrangements but follows the same principles and legal rules as this policy.)

1.2 Images are monitored and recorded centrally and are used in strict accordance with this policy.

1.3 The data subjects (i.e. individuals) filmed on the system include:

- College staff;
- pupils and parents;
- alumni;
- visitors;
- contractors;
- prospective parents and pupils;
- visiting speakers;
- volunteers;
- sports club members;
- inspectors;
- professional advisers and consultants;
- hirers and their guests; and
- pupils from other schools (including sports teams).

In addition, there are occasions each year when the College is open to the public (e.g. the Christmas Fair).

1.4 CCTV digital images showing a recognisable person are personal data and are covered by Data Protection Law (including the General Data Protection Regulation). The College recognises its obligations under Data Protection Law in connection with its use of CCTV and the rights of individuals whose images are recorded on CCTV (i.e. 'data subjects').

1.5 The Director of Facilities, the Facilities Manager and the Control Room Administrator are jointly responsible for the operation of the system and for ensuring compliance with this policy. They may be contacted as follows:

Director of Facilities:

Kim Fisher

Tel: 07790 575842

0208 693 3601 Extension 239

Email: fisherk@dulwich.org.uk

Facilities Manager: **Derrick Copeland**

Tel: 07872 456060 0208 693 3601 Extension 387

Email: copelanddl@dulwich.org.uk

Control Room Administrator: **Terry Robinson**

Tel: 0208 693 3601 Extension 437

Email: robinsont@dulwich.org.uk

2. The system

- 2.1 The system comprises: Fixed position cameras; Pan Tilt and Zoom cameras; Monitors; Multiplexers; digital recorders and Public information signs.
- 2.2 Cameras are located at strategic points on the campus, principally at the entrance and exit point of sites and buildings. No camera will be hidden from view. All cameras will be prevented from focussing on the frontages or rear areas of private accommodation.
- 2.3 Signs are prominently placed at strategic points and at entrance and exit points of the campus to inform staff, pupils, visitors and members of the public that a CCTV installation is in use.
- 2.4 Although every effort has been made to ensure maximum effectiveness of the system, it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

3. Purpose of the system

- 3.1 The system has been installed by the College with the primary purpose of reducing the threat of crime generally, protecting the College's premises and helping to ensure the safety of all the College's staff, pupils and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by monitoring the system to:
 - Deter those having criminal intent
 - Assist in the prevention and detection of crime
 - Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order
 - Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against staff or pupils and assist in providing evidence to managers

and/or to a member of staff or pupil against whom disciplinary or other action is being considered

- Facilitate the movement of vehicles on site.
- In the case of security staff, to provide management information relating to employee compliance with contracts of employment

3.2 The system will not be used:

- To provide recorded images for the world-wide-web.
- To record sound other than in authorised covert recording situations in according with paragraph 3.3 below

3.3 Covert cameras may only be used with the written authority of the Master, the Deputy Master Pastoral, the Chief Operating Officer or the Director of Facilities. Covert recording only takes place where there is reason to suspect that unauthorised or illegal activity is taking place or is about to take place. Any such recording will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity. The decision to use covert recording will be documented.

4. The Security Control Room at Dulwich College

4.1 Images captured by the system will be monitored and recorded in the Security Control Room ("the Control Room"), twenty-four hours a day throughout the whole year.

4.2 No unauthorised access to the Control Room will be permitted at any time. Access will be strictly limited to authorised staff, authorised contractors, police officers and any other person with statutory powers of entry.

4.3 The following members of staff are authorised to view the CCTV screens in the Control Room:

- The Master, the Deputy Masters and the Clerk to Governors
- The Chief Operating Officer, the Director of Facilities, the Facilities Manager, the Deputy Facilities Manager, the Control Room Administrator and Site Officers.

4.4 Other persons (including other staff, contractors and pupils) may be permitted to view the CCTV screens in the Control Room on a case-by-case basis and only then on: (a) written authorisation from the Master, the Chief Operating Officer, the Director of Facilities or the Facilities Manager; or (b) in an emergency, with oral authority from one of the above-mentioned persons or the member of staff on duty in the Control Room at the time.

4.5 Before allowing anyone other than the Control Room Administrator and Site Officers to view the CCTV screens in the Control Room, a member of staff on duty in the Control Room will satisfy themselves of the identity of and authorisation of the person in question. He/she will be required to complete and sign the visitors' log, which shall include their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from the Control Room. A similar log will be kept of the staff on duty in the Control Room and any visitors granted emergency access.

5. Control Room Staff

5.1 All staff working in the Control Room will be made aware of the sensitivity of CCTV images and recordings. The Control Room Administrator will ensure that all staff are fully briefed and trained in respect of the functions (operational and administrative) arising from the use of CCTV.

5.2 Training in the relevant provisions of Data Protection Law will be given to all those required to work in the Control Room.

6. Recording

6.1 Digital recordings are made using digital video recorders operating in time lapse mode. Incidents may be recorded in real time.

6.2 All hard drives and recorders remain the property of the College until disposal and destruction.

7. Access to images

7.1 Access to images internally will be restricted to those College staff who need to have access for the proper performance of their duties and in accordance with the purposes of the system (including the persons listed in [the Appendix](#) to this policy). Access to images will not be given to other members of staff **except**:

- with the written authority of the Master, a Deputy Master, the Chief Operating Officer, the Director of Facilities or the Clerk to Governors (which may be given by email); or
- where a member of staff makes a request for access to images/recordings of himself/herself (see paragraph 8 below re 'Subject Access Requests').

7.2 There will be no disclosure of images to third parties without the written authority of the Master, a Deputy Master, the Chief Operating Officer, the Director of Facilities or the Clerk to Governors (which may be given by email.) Disclosure of recorded material to third parties will only be permitted when properly required given the purposes of the system, for example:

- Law enforcement and prosecution agencies (where images recorded would assist in a criminal investigation or prosecution and/or the prevention of crime)
- Social services, the Health & Safety Executive and other governmental bodies having relevant legal jurisdiction
- Relevant professional advisers (e.g. security and legal advisers)
- Emergency services in connection with the investigation of a fire or accident
- Hirers (where images recorded would assist in the investigation of a suspected criminal matter)

Access to images by third parties will only take place once they have completed an access request form.

8. Subject Access Requests

- 8.1 Requests by individual data subjects for images/recordings of themselves ('Subject Access Requests') should be submitted in writing to the Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD. In order to locate the images on the system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
- 8.2 Where the College is unable to comply with a Subject Access Request without disclosing the personal data of another individual, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure or that it is reasonable in the circumstances to comply without the consent of the individual. Data Protection Law also entitles the College to refuse a request where it could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders. If a Subject Access Request is refused, the reasons will be documented and the data subject informed in writing.

9. Access Log

All access to images held by the Control Room will be recorded in the Access Log.

10. Retention

- 10.1 Images will normally be retained for thirty days from the date of recording, and then automatically overwritten and the log updated accordingly. However, images may be retained longer where reasonably required for the purposes of an investigation (e.g. a suspected theft or other wrongdoing) but will be disposed of when no longer required.
- 10.2 Once a hard drive has reached the end of its use it will be securely erased prior to disposal and the Log will be updated accordingly.

11. Breaches

- 11.1 Disciplinary action may be taken against staff who breach this Policy and/or make improper use of CCTV images and recordings.
- 11.2 Staff are reminded that Data Protection Law requires that most data breaches are reported to the Information Commissioner's Office (the United Kingdom's data regulator) within 72 hours. In order that the College complies with that reporting obligation, it is very important that staff report actual or suspected breaches of this policy promptly to their line manager or one of the following persons: The Clerk to Governors, the Chief Operating Officer, the Deputy Master Pastoral, the Assistant Head Pastoral or the Director of Facilities.

12. Monitoring

- 12.1 All documented procedures will be kept under review and a report periodically made to the Chief Operating Officer.
- 12.2 The effectiveness of the system in meeting its purposes will be kept under review.

13. Queries and complaints

- 13.1 If you have any query about this Policy or believe that the College has breached the data protection legislation, please contact the Clerk to Governors, Dulwich College, Dulwich Common, London SE21 7LD. Telephone: 0208 299 9306. Email: legal@dulwich.org.uk
- 13.2 You also have the right to take any complaints about how we process your personal data to the Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF (Tel: 0303 123 1113 Website: www.ico.org.uk/concerns). Please note that the ICO recommends that steps are taken to resolve matters with the relevant organisation first, before involving the ICO.

The Appendix

Staff authorised to view CCTV Images/recordings (when required)

1. The Director of Facilities, The Facilities Manager and the Deputy Facilities Manager
2. The Control Room Administrator and Site Officers
3. Members of the College Leadership Team
4. Heads of School and Year Heads
5. The Assistant Head Pastoral and the Assistant Head Co-Curricular
6. Boarding House Masters
7. Heads of Subject/Department, the Director of Sport and the Director of Music
8. The Human Resources Manager and the Human Resources Advisors
9. Staff and Pupils in connection with disciplinary matters which directly concern them
10. Trade Union representatives only in connection with disciplinary matters which directly concern one of their members (subject to the person's written request and consent)