



SISPP SFG008 CCTV Policy - draft

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| Reviewed by the Senior Team on: |
| Authorised by the Senior Team on: |
| Date of Next Review by School Senior Leaders: 01/05/2024 |

Shrewsbury International School Phnom Penh is committed to providing outstanding care and education to its pupils and to safeguarding and promoting the welfare of children and young people.

Introduction

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at Shrewsbury International School Phnom Penh (the School). It also serves as a notice and a guide to data subjects (including pupils, parents, staff, volunteers, visitors to the School and members of the public) regarding their rights in relation to personal data recorded via the CCTV system (the System).

The System is administered and managed by the School, who acts as the Data Controller. This policy will be subject to review from time to time, and should be read with reference to the School's Privacy Notice (once complete).

All fixed cameras are in plain sight on the school premises and the School does not routinely use CCTV for covert monitoring or monitoring of private property outside the School premises. (The ICT Technician maintains a list of camera locations).

The School's purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the School believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

1. Objectives of the System

1.1 To protect pupils, staff, volunteers, visitors and members of the public with regard to their personal safety.

1.2 To protect the School buildings and equipment, and the personal property of pupils, staff, volunteers, visitors and members of the public.

1.3 To support the police and community in preventing and detecting crime, and assist in the identification and apprehension of offenders.

1.4 To monitor the security and integrity of the School site and deliveries and arrivals.

1.5 To monitor staff and contractors when carrying out work duties.

1.6 To monitor and uphold discipline among pupils in line with Pupil Code of Conduct and School Rules.

2. Positioning

2.1 Locations have been selected, both inside and out, that the School reasonably believes require monitoring to address the stated objectives. See Appendix 1 for detail.

2.2 Adequate signage has been placed in prominent positions to inform staff and pupils that they are entering a monitored area, identifying the School as the Data Controller and giving contact details for further information regarding the system.

2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.

2.4 No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

3.1 The CCTV system will be operational 24 hours a day, every day of the year.

3.2 The System Manager (defined below) will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.

3.3 The system will be checked and (to the extent necessary) serviced no less than annually.

4. Supervision of the System

4.1 Staff authorised by the School to conduct routine supervision of the system.

4.2 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.

5. Storage of Data

5.1 The day-to-day management of images will be the responsibility of the General Manager who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.

5.2 Images will be stored for 30 days and automatically over-written unless the School considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.

5.3 Where such data is retained, it will be retained in accordance with School Privacy notice and policy. 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.

6. Access to Images

6.1 Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).

Authorised persons include:

- Principal
- Deputy Principal
- General Manager

- CEO

These same persons act as approvers for each other in order to avoid any single member of staff accessing the data without a record of the access. This is to protect those who access the data, not to restrict use of the System. The authorised persons will receive specific training in the relevant safeguarding protocols.

6.2 Individuals also have the right to access personal data the School holds on them (please see the Privacy Notice), including information held on the system, if it has been kept. The School will require specific details including at least to time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

6.3 The following are examples when the access to the live or stored CCTV images may be authorised:

6.3.1 Where required to do so the Police or some relevant statutory authority;

6.3.2 To make a report regarding suspected criminal behaviour;

6.3.3 To enable the Designated Safeguarding Lead or his/her appointed deputy to examine behaviour which may give rise to any reasonable safeguarding concern;

6.3.4 To assist the School 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;

6.3.5 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above;

6.3.6 To the School's insurance company where required in order to pursue a claim for damage done to insured property; or

6.3.7 In any other circumstances required under law or regulation.

6.4 Where images are disclosed under 6.3 above a record will be made in the system log book including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable). Appendix 1 CCTV Access Review Form.

7. Complaints and queries

7.1 Any complaints or queries in relation to the School's CCTV system, or its use of CCTV, or requests for copies, should be referred to the General Manager.

Adapted from Data Policies, Shrewsbury School– September 2022

Appendix 1.

CCTV Access Request Form

| | |
|--|------------|
| Name of staff member seeking access or footage. | |
| Date/time of incident. | |
| Nature of incident. | |
| Video/still/observation only. | |
| Approved by any one of the following: <ul style="list-style-type: none">• Principal• Director | Signature: |
| Date of request: | Date: |

Outcome & other notes (including cameras accessed):

File to System Manager who keeps this information as 'the log'.

Camera Descriptions & On Screen Display Names

(In order of system entries)

- | | |
|-----------------------------------|---------------------------------|
| 1 – Reception Room | 11 – Service Lift Area |
| 2 – Admin Corridor | 12 – PE Room |
| 3 – Front Entrance (GF) | 13 – Nursery Corridor |
| 4 – Pre Nursery 2 | 14 – Top Door (M) Inside |
| 5 – Top Entrance (M) | 15 – Dining Area |
| 6 – Pre Nursery 1 | 16 – Playground |
| 7 – Outdoor Area Room | 17 – Admin Corridor 2 |
| 8 – VIP Room | 18 – Nursery Room |
| 9 – GF Reception Lift View | 19 – Woodwork Room |
| 10 – Music Room | 20 – Entrance Corridor |
| | 21 - Stairs |

CCTV – Camera Allocations

1 – Reception Room



2 – Admin Corridor

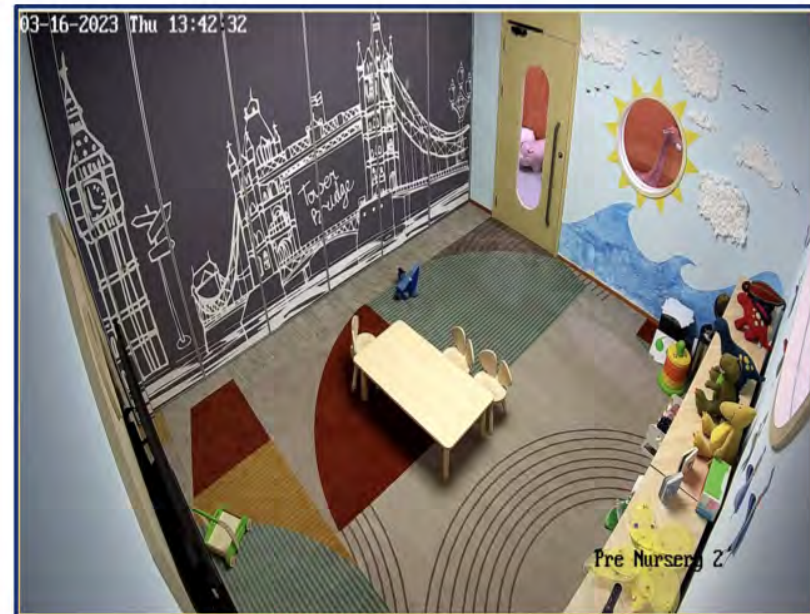


CCTV – Camera Allocations

3 – Front Entrance

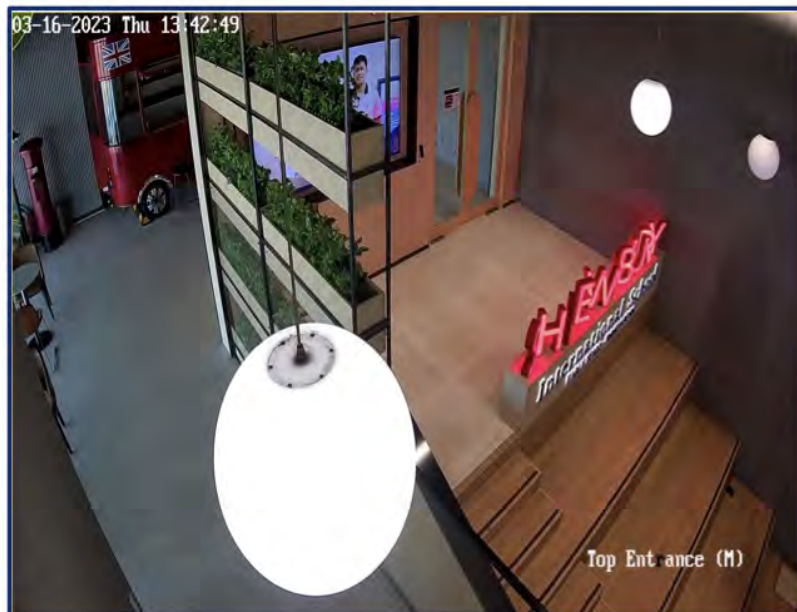


4 – Pre Nursery 2



CCTV – Camera Allocations

5 – Top Entrance (M)

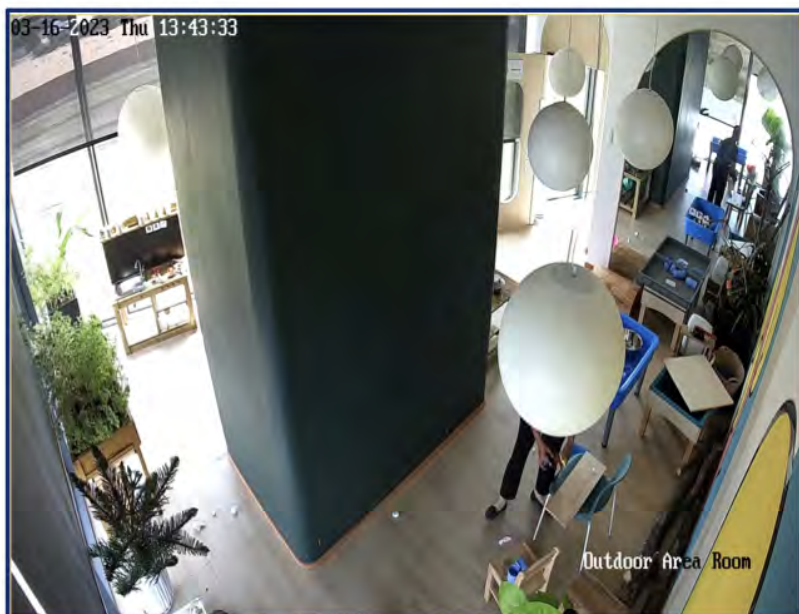


6 – Pre Nursery 1



CCTV – Camera Allocations

7 – Outdoor Area Room

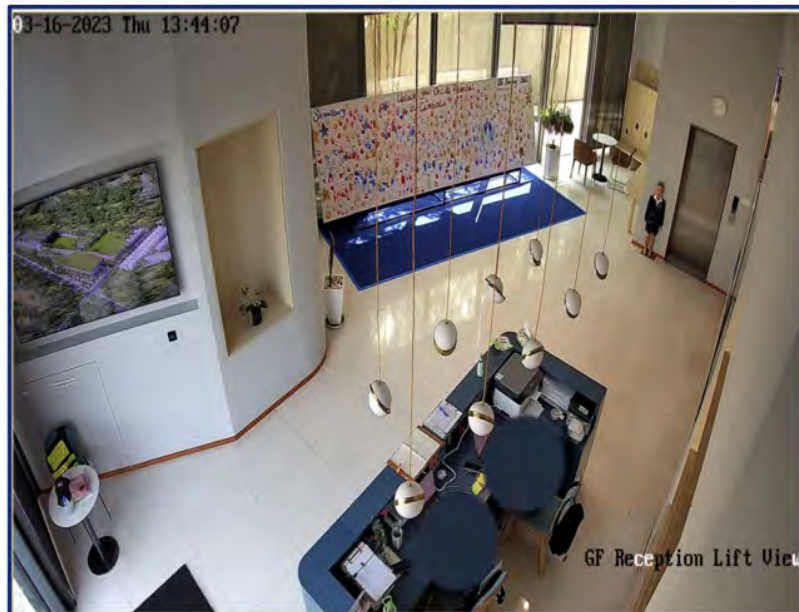


8 – VIP Room

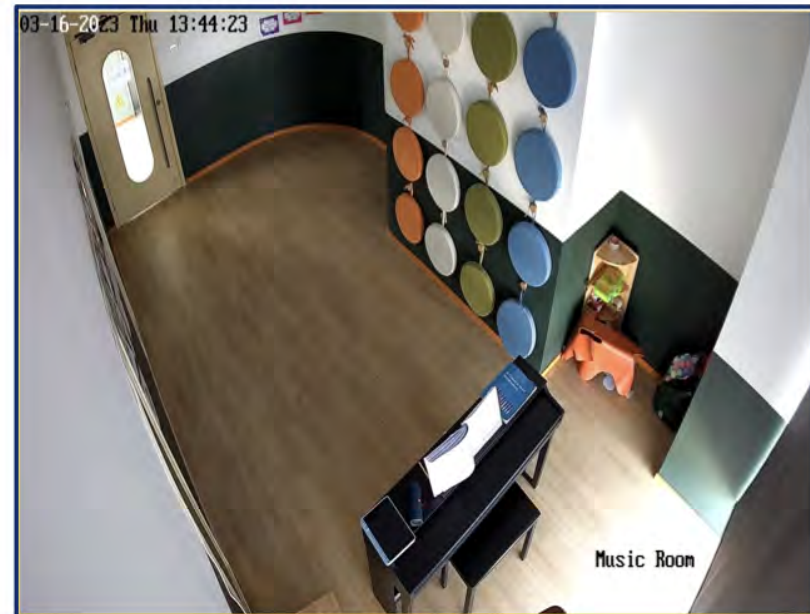


CCTV – Camera Allocations

9 – GF Reception Lift View



10 – Music Room



CCTV – Camera Allocations

11 – Service Lift Area



12 – PE Room



CCTV – Camera Allocations

13 – Nursery Corridor



14 – Top Door (M) Inside



CCTV – Camera Allocations

15 – Dining Area



16 – Playground

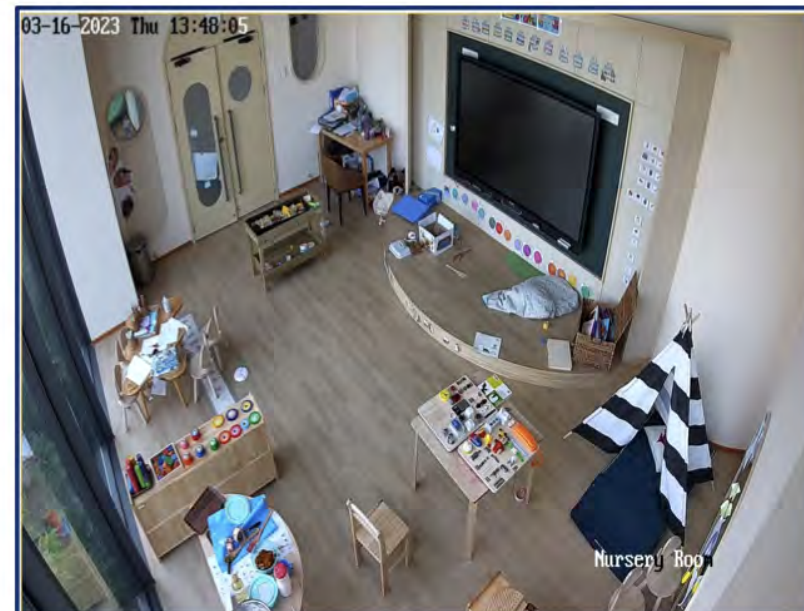


CCTV – Camera Allocations

17 – Admin Corridor 2



18 – Nursery Room

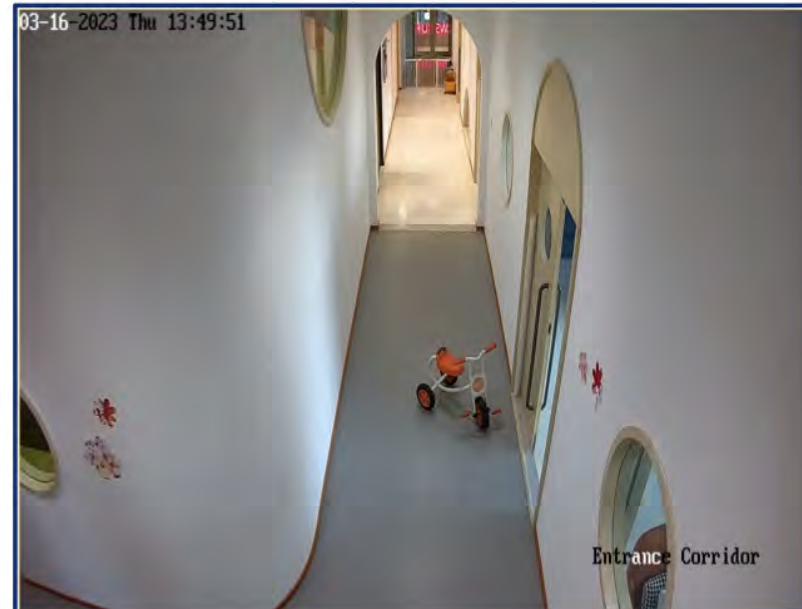


CCTV – Camera Allocations

19 – Woodwork Room

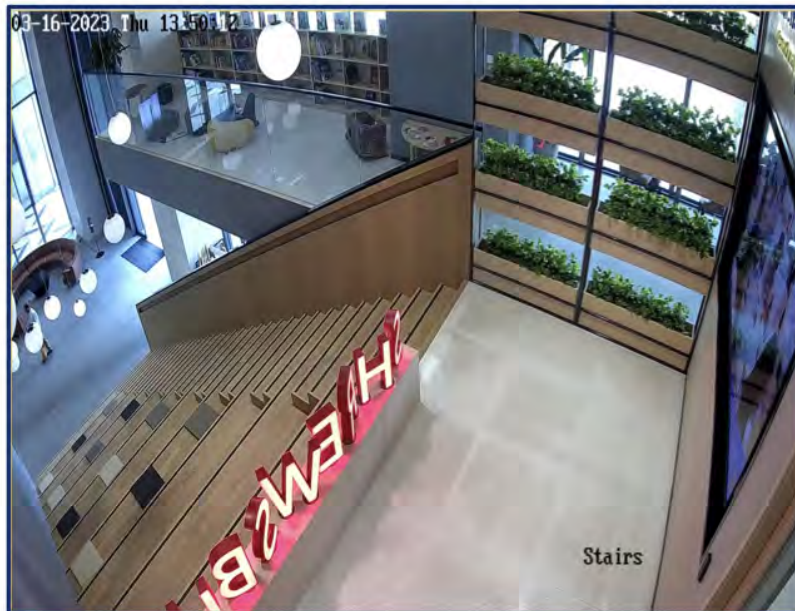


20 – Entrance Corridor



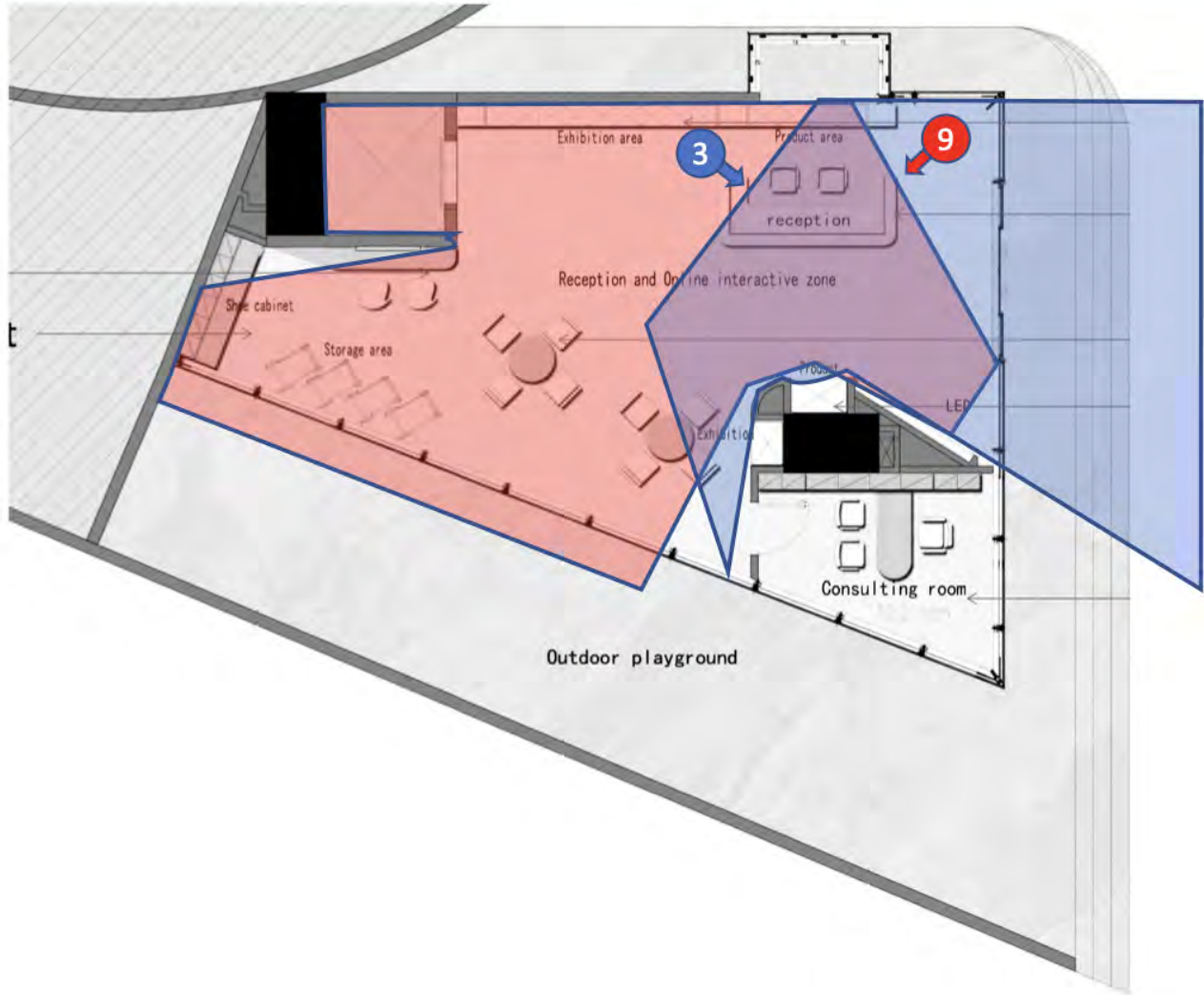
CCTV – Camera Allocations

21 - Stairs



CCTV – Camera Location Map (Ground Floor)

- 3 – Front Entrance
- 9 – GF Reception Lift View



CCTV – Camera Location Map (Mezzanine Floor)

- 1 – Reception Room
- 2 – Admin Corridor
- 4 – Pre Nursery 2
- 5 – Top Entrance (M)
- 6 – Pre Nursery 1
- 7 – Outdoor Area Room
- 8 – VIP Room
- 10 – Music Room
- 11 – Service Lift Area
- 12 – PE Room
- 13 – Nursery Corridor
- 14 – Top Door (M) Inside
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