



CLOSED CIRCUIT TELEVISION (“CCTV”) POLICY

1. Purpose

The purpose of this policy is to regulate the use of Closed Circuit Television at Epsom College in Malaysia (“the College”) and its associated technology in both internal and external monitoring. It relates directly to the locating of equipment, recording and subsequent viewing and storage of such material.

CCTV systems are installed across the College for the purpose of enhancing the security of the buildings and its associated equipment, as well as creating awareness among the occupants that a surveillance security system is in operation during both day and night. CCTV surveillance at the College is intended for the purposes of:

- protecting the College buildings and assets, both during and after school hours;
- promoting the health and safety of staff, pupils and visitors;
- preventing bullying;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that College rules are respected.

2. General principles

- Epsom College in Malaysia has a responsibility for the protection of its property, grounds and equipment as well as providing a sense of security to its pupils, staff and visitors. The College has a duty of care to utilise CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the community.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy (e.g. CCTV will not be used for monitoring employee performance).

- Information obtained through the CCTV system may only be viewed with authorisation from the Headmaster/Deputy Head (Pastoral) or Bursar. Any requests for CCTV recordings/images will be recorded by the Senior Facilities Manager.

- CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the College, including Equality & Diversity Policy, Complaints Policy and Anti-Bullying Policy. This policy prohibits monitoring based on race, gender, sexual orientation, national origin, disability etc. CCTV monitoring of public areas for security purposes within the College is limited to uses that do not violate the individual's reasonable expectation to privacy.
- Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee or pupil of the College.
- All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions as set out in the College's Data Protection & Use of Images Policy.

3. Justification for use of CCTV

The College must be able to justify the purpose for which data is monitored and stored. It must be "*adequate, relevant and not excessive*" for the purpose for which it is collected. For example, the use of CCTV to control the perimeter of the College site for security purposes is justified as the system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal teacher/student classroom activity in school.

In other areas of the school where CCTV has been installed (e.g. entrance to Boarding Houses, Hallways, Stairwells) the College is confident that there is a potential risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen.

4. Location of cameras

The location of cameras is a key consideration. Epsom College in Malaysia has selected locations for the installation of CCTCV cameras which are least intrusive to protect the privacy of individuals.

CCTV Video Monitoring and Recording of Public Areas in (school name) may include the following:

- **Protection of school buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, receiving areas for goods/services; Boarding House entrances and stairwells/corridors within;
- **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas; and
- **Video Patrol of** main entrance/exit gates.

5. Storage & Retention

Data shall not be kept for longer than is necessary for the purposes for which it was obtained. The College must be able to justify its retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (14 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 14 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in the Server Room which is a restricted areas for the storage and monitoring of CCTV equipment. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Headmaster/Deputy Head (Pastoral)/Bursar. The Headmaster/Deputy Head (Pastoral)/Bursar may delegate the administration of the CCTV System to another staff member (e.g. the Senior Facilities Manager). In certain circumstances, the recordings may also be viewed by other individuals (e.g a pupil's HMM). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Given cultural sensitives in Malaysia, the Headmaster/Deputy Head (Pastoral) or Bursar may also request for a female member of staff to view a recording taken within a girls' boarding house in the first instance.

6. Access

The recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to tapes/images will be maintained.

In relevant circumstances, CCTV footage may be accessed:

- By a member of the Police where Epsom College in Malaysia is required by law to make a report regarding the suspected crime; or
- Following a request by the Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on the premises; or
- To assist the Headmaster in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardians will be informed;
- To individuals (or their legal representatives) subject to a court order; or
- To the College's insurance company where the insurance company requires such recorded data in order to pursue a claim for damage done to the insured property.

7. Responsibilities

The Headmaster/Bursar will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Epsom College in Malaysia;
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Epsom College in Malaysia;

- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy;
- Ensure that the CCTV monitoring at Epsom College in Malaysia is consistent with the highest standards and protections;
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy;
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system;
- Ensure that monitoring recorded tapes are not duplicated for release;
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally;
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the school and be mindful that no such infringement is likely to take place;
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 28 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Chairperson of the Board;
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy;
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics;
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas;
- Ensure that cultural sensitivities are taken into account when a need arises to view a recording within a girls' Boarding House; and
- Ensure that where a police request to set up mobile video equipment for criminal investigations is received, legal advice has been obtained and such activities have the approval of the Chairman of the Board.

The College will publish this policy to its staff and pupils. It is available on request to parents/visitors from the Headmaster's PA.

8. Security Companies

- The College has complete control of cameras, and extraction of recording when needed.
- The contracted security company comes in following a request made by the College in the event of faulty cameras, network infrastructure issues etc.
- Outside contractors will be supervised at all times when undertaking work on the CCTV system.