



**The Maria Montessori Training Organisation
trading as
The Maria Montessori Institute**

CCTV Policy

Purpose

The purpose of this policy is to regulate the management and operation of the Closed Circuit Television (CCTV) System at 41 Riding House Street, W1W 7BE (the **Training Centre**). It also serves as a notice and a guide to data subjects (including, students, staff, volunteers, visitors the Training Centre 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 Maria Montessori Institute, which acts as the Data Controller. This policy will be subject to review from time to time and should be read with reference to the Institute's Data Protection Policy and Privacy Notice. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here:

<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>)

All cameras are fixed and are in plain sight on the Training Centre premises and the MMI does not routinely use CCTV for covert monitoring or monitoring of private property outside its grounds.

Positioning:

Locations have been selected, both inside and out, that the Institute reasonably believes require monitoring to address the stated objectives.

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

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

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

Cameras are located at:

- Entry Door
- Ground Floor hallway
- Lower Ground Floor hallway



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

Objectives of the System

- To protect children, parents, student, staff, volunteers, visitors and members of the public with regard to their personal safety.
- To protect the School and Training Centre buildings and equipment, and the personal property of children, students, 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 School and Training Centre sites and deliveries and arrivals.
- To monitor contractors when carrying out work duties.

Maintenance

- The CCTV System will be operational 24 hours a day, every day of the year.
- 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.
- The System will be checked and (to the extent necessary) serviced no less than annually.

Supervision of the System

- Staff authorised by the Institute to conduct routine supervision of the System may include the Bursar, Executive Director and other Senior Staff.
- 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.

Storage of Data

- The day-to-day management of images will be the responsibility of the Bursar who will act as the System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
- Images will be stored until automatically over-written unless the Institute 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.
- Where such data is retained, it will be retained in accordance with the Act and our Data Protection 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 a system log book.



Access to Images

- 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).
- Individuals also have the right to access personal data the Institute holds on them (please see the Institute's Privacy Notice and Data Protection Policy), including information held on the System, if it has been kept. The Institute will require specific details including at least: 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.
- The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request.

- The following are examples when the System Manager may authorise access to CCTV images:
 - Where required to do so by the Executive Director, 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 Institute in establishing facts in cases of unacceptable child or student behaviour, in which case, the parents/guardian of a child in the School 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 above;
 - To the School'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.

Where images are disclosed 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).

Complaints and queries

Any complaints or queries in relation to the Institute's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Bursar by email via info@mariamontessori.org

For any other queries concerning the use of your personal data by the Institute, please see the Institute's applicable Privacy Notice.