

International School of
Hamburg

September 2020



CCTV Policy

CCTV Policy for International School of Hamburg

1. Introduction

We currently use CCTV cameras to view and record individuals on and around our premises in order to help us maintain a safe and secure environment, but we recognise that individuals may have concerns about the effect of such filming on their privacy. This policy is intended to address those concerns and to provide reassurance about the safeguards we have in place.

Images recorded by the CCTV cameras are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring the privacy rights of staff, students, parents, guardians and visitors are recognised and respected.

This policy will therefore outline why we use camera surveillance, how we use it and how we process the data we capture to ensure we are compliant with data protection law and best practice.

2. Scope

This policy applies to all staff, students, parents, guardians, members of the board and visitors at the International School of Hamburg.

3. Responsible personnel

The Head of school is responsible for adherence to this policy and for ensuring compliance with German and European data protection regulations.

The Head of School, with the codetermination of the school works council, determines what information is recorded, how it will be used, and to whom it will be disclosed, in accordance with German and European data protection regulations.

Operational responsibility for the CCTV system is delegated by the Head of School to the Business Director. Daily operational responsibility is delegated by the Business Director to the Facility Manager, who cooperates with the subcontracted parties listed below to maintain operation of the CCTV system. The Network & IT Manager cooperates with the party listed in 4.1 to maintain data security measures.

The responsibility for ensuring this policy is kept up to date has been delegated to the Data Protection Officer.

4. Service Providers (Subcontractors)

- 4.1.** HSW Hanseatische Schutz- und Wachdienst GmbH
Spenglerstraße 39-41
23556 Lübeck

We deploy the services of HSW to operate and maintain our video surveillance (CCTV) system. HSW is contractually responsible for the maintenance of the system, including the transfer, storage, retrieval, integrity and security of the video footage and the related metadata.

We have concluded a Data Processing Agreement with HSW in line with the General Data Protection Regulation (GDPR).

4.2. Ponds Security GmbH

Rückinger Straße 12
63526 Erlensee

We deploy the services of Ponds Security to provide manned security services to protect individuals, facilities and equipment residing on the ISH campus. The on-site guard services protect life, prevent unauthorized access, maintain order, prevent criminal attacks on students, employees, and visitors, and prevent property theft and destruction. In performing their duties the on-site guards routinely monitor live CCTV footage. Ponds Security personnel are subject to their organisation's code of conduct and enter into confidentiality agreements.

5. Reasons for the use of CCTV

We currently use CCTV around our site for the following purposes: -

- for the security and personal safety of staff, students, visitors and other members of the public, and to act as a deterrent against crime;
- to protect buildings and assets from damage, disruption, vandalism and other crime;
- to support law enforcement bodies in the prevention, detection and prosecution of crime.

We consider the use of CCTV to be in our legitimate interests to protect property and to maintain the safety of individuals.

6. Location of cameras

The location of each camera is carefully chosen so that it will only monitor the area relevant for the intended purpose. Cameras are solely positioned to surveil the exterior of the building.

The current locations of our CCTV cameras are as follows:-

- The exterior of the building, including the main and secondary exits in these locations:
 - ❑ 2 cameras surveilling the the main and secondary gate entry at the front (South side) of the school
 - ❑ 1 camera surveilling gate exits at the west side of the school
 - ❑ 1 camera surveilling the gate exits at the rear (North side) of the school
- No interior cameras are in operation.

7. System operation

Our cameras are in operation 24 hours a day, 365 days a year.

Our cameras are not used to record sound.

We ensure that signs are displayed in a prominent area adjacent to the surveillance zone to alert individuals that their image may be recorded. These signs contain the following information:-

The International School of Hamburg operates CCTV in this area.
We are recording images in this area in accordance with our CCTV Policy for the legitimate interests of protecting property and maintaining the safety of individuals.
Please contact dataprotection@ishamburg.org for further information.

Live images collected by the CCTV are viewed in secure offices by security guard employees of the service provider listed in 4.2. Viewing of recorded images is only permitted by a limited number of authorised members of staff and under strict protocols co-determined with the school's work council and in adherence with data protection provisions. All instances of viewing footage are documented.

8. Storage of data

In order to ensure that the rights of individuals recorded by the CCTV system are protected, our subcontractor guarantees by way of contract that data gathered from CCTV cameras is transmitted and stored in a way that maintains its integrity and security.

9. Data retention

Images will be automatically deleted after 10 working days unless the images are required as evidence or for a purpose stated above which requires a longer retention period, in which case the images will be deleted once that purpose has been fulfilled.

Once the purpose for holding the images has been fulfilled, all images will be erased permanently and securely by our service provider listed in 4.1. Any physical matter, such as still photographs, hard copy prints, tapes or discs, will be disposed of as confidential waste.

10. Management of CCTV

Prior to the introduction of any new CCTV cameras, we carefully consider where they are placed and what data they will capture by carrying out a Data Protection Impact Assessment (DPIA). This process is intended to assist us in deciding whether the new cameras are necessary and proportionate in the circumstances.

11. Review of CCTV use

We ensure that the use of our existing CCTV cameras is reviewed periodically, and at least on an annual basis. We also ensure that their use remains necessary and appropriate and that we are continuing to address the needs that justified the camera's initial introduction.

12. Requests for disclosure

We may allow appropriate law enforcement agencies to view or remove CCTV footage where this is legally required for the detection or prosecution of crime.

We may also release CCTV footage to a third party where it has been requested by way of a court order.

We maintain a record of all disclosures of CCTV footage.

We do not post images captured on CCTV online or disclose them to the media.

13. Subject access requests

Individuals may make a request for the disclosure of their personal data and this may include CCTV images. This is called a Subject Access Request.

To enable us to locate relevant footage, any requests for recorded CCTV must include the date and time of the recording, the location of where the footage was captured and, if necessary, information identifying the individual concerned.

We are required to obscure images of identifiable third parties when disclosing CCTV images as part of a subject access request

All Subject Access Requests are to be made in writing to dataprotection@ishamburg.org .

14. Contact us

If you have any questions relating to this policy or wish to lodge a complaint, please contact dataprotection@ishamburg.org