DULWICH COLLEGE
FOUNDED 1619

CCTV POLICY

MAIN CAMPUS

Introduction

1.1 Dulwich College uses CCTV equipment and systems on its main campus. Images are monitored and recorded centrally and will be used in strict accordance with this policy.

1.2 The system is owned by Dulwich College, Dulwich Common, London SE21 7LD, and is registered with the Information Commissioner's Office (Reg #Z4928508).

1.3 CCTV digital images showing a recognisable person are personal data and are covered by the Data Protection Act 2018.

This Policy should be read alongside the College's Data Protection Policy and relevant Privacy Notices (available on the College's website at www.dulwich.org.uk), the provisions of which must be adhered to at all times.

Key Staff

2.1 The Chief Operating Officer ("COO") is responsible for the operation of the CCTV system and for ensuring compliance with this policy, assisted by the Head of Facilities and the Security Manager. Their contact details are as follows:

- **The COO:** Simon Yiend. College extension 182. Email: yiends@dulwich.org.uk
- **The Head of Facilities:** Ashley Vincent. College extension 437. Email:VincentAR@dulwich.org.uk
- **The Security Manager:** Tashe Kostov. College extension 388. Email: KostovT@dulwich.org.uk

2.2 The College's **Data Protection Officer** is Katy Jones. Telephone 020 8299 9306. Email: jonesk@dulwich.org.uk

The CCTV System

3.1 The College's CCTV system comprises: fixed position cameras; pan tilt and zoom cameras; monitors: multiplexers; digital recorders; and public information signs.

3.2 Cameras will be 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 and all will be prevented from focussing on the frontages or rear areas of private accommodation.

3.3 Signs will be prominently placed at strategic points, including the entrance and exit points of the campus, to inform staff, pupils, visitors and members of the public that a CCTV installation is in use.

3.4 Cameras are located in the Boarding Houses to ensure the safety and security of those locations, care is taken to protect the privacy of the boarding community.

3.5 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.

Purpose of the System

4.1 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 the College's staff, pupils and visitors. The potential impact on individuals' privacy has been identified and taken into account in the use of the system to ensure that it is consistent with respect for the individuals' privacy.

4.2 The purposes of the CCTV system will be achieved by monitoring the system to:

- Safeguard children and adults at risk
- 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, or is threatened to be taken
- Facilitate the control of movement of vehicles on site
- Provide management information relating to employee compliance with contracts of employment

4.3 The system will not be used:

- To provide recorded images for the world-wide-web

- To record sound other than in previously authorised covert recording situations as per paragraph 5 of this policy

Covert Recording

5.1 Covert cameras may be used by the Facilities Department with the prior approval of the Master, the Chief Operating Officer, the Senior Deputy or the Data Protection Officer, under the following circumstances:

- when informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and

- when there is reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place.

5.2 Any such covert processing 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.

5.3 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

The Security Control Room

6.1 Images captured by the CCTV system will be monitored and recorded in the Security Control Room, twenty-four hours a day throughout the whole year. Monitors are not visible from outside the Control Room.

6.2 The CCTV recording systems must be located in a locked cabinet inside the Control Room, to prevent unauthorised staff members having access. The CCTV monitors must also be located here, with the screens facing away from the entry point. The Control Room itself is a restricted area. No unauthorised access to the Control Room will be permitted at any time. Access will be strictly limited to those listed in Appendix 1 and those requiring access for cleaning or maintenance purposes. In the latter case of staff servicing the facilities, they should not be left unsupervised in the Control Room where CCTV images are visible.

6.3 Other members of staff, pupils and visitors may be granted access to the Control Room on a case-by-case basis if expressly authorised by one of the following: The Master, the Chief Operating Officer, the Data Protection Officer, a Deputy Master, or the Head of Facilities (see Appendix 2). In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate and urgent reason to enter the Control Room. It will be usually possible for the Security staff on duty in silent hours to contact and seek permission from either the Chief Operating Officer, Head of Facilities or a Deputy Master, and they should not hesitate to do so.

6.4 Before allowing access to the Control Room, staff must satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the visitors' log, which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from the centre. A similar log will be kept of the staff on duty in the Security Control Room and any visitors granted emergency access.

Security Control Room Administration and Procedures

7.1 In the event of an incident recorded on CCTV, the recording must be viewed with a second person from the list set out at Appendix 1 and a Head of School or Boarding Housemaster (if the incident occurs inside boarding houses). A record must be kept of the viewing, detailing the names of the individuals present in the Control Room at the time.

7.2 A recording of an incident should not be retained unless one or more of the following persons considers that the recording contains information that may be relevant to a serious matter: The Master, the Chief Operating Officer, a Deputy Master or the Head of Facilities.

7.3 CCTV recordings can be duplicated and made available for outside agencies such as the Police and insurance companies in the event of an incident which may require further investigation. When CCTV recordings are recorded for any outside agency, the information is to be burned onto a CD or USB and documented on a CCTV digital incident log form. The CD and digital incident log form are both to be given to the Head of Facilities, who will lock the information in a safe location until the data is collected by the appropriate agency. Where possible, recordings will be encrypted. If the Head of Facilities is not available, this office should be performed by the Security Manager.

7.4 If CCTV recordings are retained, the Head of Facilities should keep a copy in a locked cupboard in his or the COO's office. Only the Head of Facilities and the Chief Operating Officer should have access to this cupboard.

Staff

8.1 All staff working in the Security Control Room will be made aware of the sensitivity of handling CCTV images and recordings and trained in the procedures detailed in this policy.

8.2 The Security Manager is responsible for ensuring day to day compliance with the Data Protection Act within the Control Room. The Security Manager will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.

8.3 The Data Protection Officer will ensure that training in the requirements of the Data Protection Act 2018 is provided for the Control Room staff.

Recording

9.1 Digital recordings are made using digital video recorders operating in time lapse mode. Incidents

may be recorded in real time.

9.2 Images will normally be retained for thirty days from the date of recording, and then automatically over-written and the Log updated accordingly. 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.

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

9.4 Regular checks are carried out to ensure that the system is working properly and produces high quality images.

Access to images

10.1 All access to images will be recorded in the Access Log.

10.2 Access to images will be restricted to those staff who need to have access in accordance with the purposes of the system. An indicative list of such staff is given at Appendix 2 but the individual circumstances should be scrutinised before access is granted.

10.3 Access to images will only take place once they have requested and completed an access request form and have been given approval to view access the images. An access request form is at Appendix 3.

10.4 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following:

- Law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder
- Prosecution agencies
- Relevant legal representatives
- People whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings.
- Emergency services in connection with the investigation of an accident.

10.5 CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act 2018. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Act. They do not have the right of instant access. Requests received in the Security Control Room should be referred in the first instance to the Chief Operating Officer, who will notify the Data Protection Officer, or if they are not available, to the Head of Facilities.

10.6 A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Data Protection Officer including proof of identity. Subject Access Request

Forms are obtainable from the Data Protection Officer and the fee of £10.00 (to cover the administrative charges of complying with the request) will be requested prior to the handover of data.

10.7 The Data Protection Officer will then arrange for a copy of the data to be made and given to the applicant. The applicant must not ask another member of staff to show them the data, or ask anyone else for a copy of the data. All communications must go through the Data Protection Officer. A response will be provided promptly and in any event within forty days of receiving the required fee, proof of identity and information.

10.8 The College has the right to refuse a request for a copy of the data in certain circumstances, including where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

10.9 If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

Complaints

11. It is recognised that staff and others may have concerns or complaints about the operation of the CCTV system. Any complaint should be addressed in the first instance to the Chief Operating Officer. Concerns or enquiries relating to the provisions of the Data Protection Act 2018 may be addressed to the Data Protection Officer. These rights do not alter the existing rights of staff of the College or others under any relevant grievance or disciplinary procedures.

Compliance Monitoring

12.1 The contact point for staff or members of the public wishing to enquire about the system will be the Head of Facilities or, in his absence, the Chief Operating Officer or the Data Protection Officer.

12.2 Upon request enquirers will be provided with:

- This policy
- An access request form
- A subject access request form

12.3 All documented procedures will be kept under review and a report periodically made to the Security Committee.

12.4 The effectiveness of the system in meeting its purposes will be kept under review and reports will be produced, as may be required by the Data Protection Officer from time to time.

SATELLITE LOCATIONS

CCTV is also in place at other locations than the main campus:

- Sports Centre
- DUCKS
- Putney Boathouse
- Trevor Bailey Sports Ground (TBSG).

All images taken by CCTV at these locations are sent by direct feed to and recorded in the Security Control Room, under the same controls as for the main campus. No recorded images are made or kept onsite in these locations. Staff at the Sports Centre and Boathouse may view live, real-time CCTV but are not able to record, play back or have access to recorded data. Images captured at DUCKS and TBSG are only viewable in the Security Control Room.

CAMERA LOCATIONS

A list of all camera locations is at Appendix 4.

Policy Owner:	Chief Operating Officer and Data Protection Officer
Last Reviewed:	September 2025
Date of Next Review:	Academic Year 2026-27

Appendix 1 **Individuals authorised to access the Security Control Room and view CCTV footage without further authority**	**Appendix 2** **Indicative list of individuals who may require access to the College's CCTV recordings in order to achieve the purposes of the system**
The Master The Chief Operating Officer The Data Protection Officer The Deputy Masters The Head of Facilities The Security Manager Security Control Room personnel	**Do not need prior authorisation:** The Master The Chief Operating Officer The Data Protection Officer The Deputy Masters Heads of Schools The Head of Facilities The Security Manager **Require prior authorisation:** The Director of Human Resources Year Heads (in the absence of a Head of School) The Boarding Housemasters Heads of Subject The Director of Sport Staff, and pupils under pastoral supervision in connection with disciplinary matters which directly concern them Trade Union representatives only in connection with disciplinary matters which directly concern one of their members (subject to the member's written request and consent).

Appendix 3

CCTV ACCESS REQUEST FORM

This form is to be completed for all requests for access to CCTV, to be handed to Control Room Staff and the completed form kept in the Security Control Room.

Name:

Department:

Position:

Date:

Details of CCTV recordings to be viewed including approximate date and time:

Include location of the incident, any identifying features or information which will aid in selecting relevant images

Reason for the request:

Request approved/denied by:

Date:

Signature:

[To be completed by Control Room staff/Sports Centre Manager/Duty Manager]

CCTV viewed: date/time:

Control Room staff member/Sports Centre Manager providing access: Name:

Signature:

Appendix 4

CCTV CAMERA LOCATIONS

PTZs are highlighted in light blue	External buildings are highlighted in light green	Offline Due to Works (Lower School)

Cameras	**Location**	**Description**
CAM 01	Alleyn Park Pedestrian gate	Colour Static - I.P.
CAM 02	Alleyn Park Vehicle gate	Colour- Static. I.P.
CAM 03	Art IT Suite	Colour Static. - I.P.
CAM 04	Centre Block North Stairs	Colour - Static. I.P.
CAM 05	Centre Block South Stairs	Colour Static. - I.P.
CAM 07	Christison Hall PTZ	Colour - PTZ. I.P.
CAM 09	Commissariat PTZ	Colour - PTZ. I.P.
CAM 10	Common room corridor	Colour - Static. I.P.
CAM 11	Ducks rear playground LHS	Colour - Static. I.P.
CAM 12	Ducks car park	Colour - Static. I.P.
CAM 13	Ducks LHS Playground	Colour - Static. I.P.
CAM 14	Ducks rear playground far	Colour - Static. I.P.
CAM 15	Ducks rear playground RHS	Colour - Static. I.P.

CAM 16	Ducks Reception	Colour -Static - I.P.
CAM 17	Eller Bank Front LHS	Colour -Static - I.P.
CAM 18	Eller Bank Car Park entrance	Colour -Static - I.P.
CAM 19	Eller Bank LHS Front Recess	Colour -Static - I.P.
CAM 20	Eller Bank Rear LH Corner	Colour -Static - I.P.
CAM 21	Eller Bank rear Playground	Colour -Static - I.P.
CAM 22	Eller Bank Rear Playground 2	Colour -Static - I.P.
CAM 23	Ivy 3rd floor cam 1	Colour -Static - I.P. /server 1
CAM 24	Ivy /Blew 1st Floor Stairs	Colour- Static - I.P. /server 1
CAM 25	Ivy/Blew 2nd floor stairs	Colour -Static - I.P./server 1
CAM 26	Ivy/Blew Front Door Internal	Colour- Static. I.P./server 1
CAM 27	Ivy/Blew College Road side	Colour -Static - I.P./server 1
CAM 28	Ivy/Blew rear entrance	Colour. Static. - I.P./server 1
CAM 29	Junior school main entrance	N/A
CAM 30	Junior school playground	Colour Static. IP
CAM 32	Orchard External LHS	Colour Static. - IP
Cameras	**Location**	**Description**

CAM 33	Orchard External Rear Doors	Colour Static. - IP
CAM 34	Orchard External RHS	Colour Static. - IP
CAM 35	Orchard Internal Plant room	Colour Static. - IP
CAM 36	Orchard Link corridor	Colour Static. - IP
CAM 37	Orchard Kitchen	Colour Static. - IP
CAM 38	LGB main entrance	Colour Static. - IP /server 2
CAM 39	LGB Ground floor side stairwell/lift	Colour Static. - IP /server 2
CAM 39	LGB ground floor corridor east view	Colour Static. - IP /server 2
CAM 40	LGB ground floor corridor west view	Colour Static. - IP
CAM 41	LGB work room LHS	Colour Static. - IP /server 2
CAM 42	LGB work room RHS	Colour Static. - IP /server 2
CAM 43	LGB side entrance music side	Colour Static. - IP /server 2
CAM 44	LGB rear entrance theatre side	Colour Static. - IP /server 2
CAM 45	LGB 2nd floor common room LHS	Colour Static. - IP /server 2
CAM 46	LGB 2nd floor common room RHS	Colour Static. - IP /server 2
CAM 47	LGB 2nd floor front stairwell	Colour Static. - IP /server 2
CAM 48	LGB 2nd floor corridor west view	Colour Static. - IP /server 2

CAM 49	LGB changing room east side	Colour Static. - IP /server 2
CAM 50	LGB changing room west side	Colour Static. - IP /server 2
CAM 51	Lower school pedestrian gate	Colour Static. - IP
CAM 52	Lower school playground	Colour Static. - IP
CAM 53	Lower School PTZ	Colour PTZ. - IP
CAM 54	Main Gate PTZ	Colour PTZ. - IP
CAM 55	Maintenance corridor	Colour Static. - IP
CAM 56	Music room 1	Colour Static. - IP
CAM 57	Music room 2	Colour Static. - IP
CAM 58	Music room IT cam 1	Colour Static. - IP
CAM 59	Music room IT cam 2	Colour Static. - IP
CAM 60	North cloister	Colour Static. - IP
CAM 61	Old Library main gate	Colour Static. - IP
CAM 62	Old Library Maintenance	Colour Static. - IP
CAM 63	Old Library North car park	Colour Static. - IP
CAM 65	Lab 1st floor Atrium L	Colour Static. - IP
CAM 66	Lab 1st floor Atrium R	Colour Static. - IP

CAM 67	Lab 2nd floor LHS	Colour Static. - IP
Cameras	**Location**	**Description**
CAM 68	Lab 2nd floor RHS	Colour Static. - IP
CAM 69	Lab Ext east steps	Colour Static. - IP
CAM 70	Lab Ext Patio LHS	Colour Static. - IP
CAM 71	Lab Ext Patio RHS	Colour Static. - IP
CAM 72	Lab Ext LHS west view	Colour Static. - IP
CAM 73	Lab Ext RHS west view	Colour Static. - IP
CAM 74	Lab Ext south block view	Colour Static. - IP
CAM 75	Lab Ext Front RHS	Colour Static. - IP
CAM 76	Lab Ext LHS Front	Colour Static. - IP
CAM 77	Lab Ext Greenhouse view LHS	Colour Static. - IP
CAM 78	Lab Ext Greenhouse view RHS	Colour Static. - IP
CAM 79	Lab Entrance East	Colour Static. - IP
CAM 80	Lab James Caird cam 1	Colour Static. - IP
CAM 81	Lab James Caird cam 2	Colour Static. - IP
CAM 82	Lab Ground Floor corridor	Colour Static. - IP

CAM 83	Lab Internal west entrance	Colour Static. - IP
CAM 84	Lab IS04	Colour Static. - IP
CAM 85	Lab IS03	Colour Static. - IP
CAM 86	Lab IS02	Colour Static. - IP
CAM 87	Lab IS05	Colour Static. - IP
CAM 88	Lab Upper Cloister	Colour Static. - IP
CAM 89	Lab IS01	Colour Static. - IP
CAM 90	Lab PTZ	Colour PTZ - IP
CAM 91	Lab West Entrance	Colour Static - IP
CAM 92	Shackleton PTZ	Colour PTZ - IP
CAM 93	Sports EXT Car park	Colour Static. - IP
CAM 94	Sports Changing rooms cam 1	Colour Static. - IP
CAM 95	Sports Changing rooms cam 2	Colour Static. - IP
CAM 96	Sports Reception	Colour Static. - IP
CAM 97	Sports Ergo room	Colour Static. - IP
CAM 98	Sports fitness suite cam 1	Colour Static. - IP
CAM 99	Sports fitness suite cam 2	Colour Static. - IP

CAM 100	Sports Foyer	Colour Static. - IP
CAM 101	Sports EXT hall rear exit	Colour Static. - IP
CAM 102	Sports pool corridor	Colour Static - I.P.
CAM 103	Sports PTZ	Colour PTZ - I.P.
Cameras	**Location**	**Description**
CAM 104	Sports EXT rear	Colour Static - I.P.
Cam 105	Sports EXT RHS	Colour Static - I.P.
CAM 106	Sports Weights room	Colour - Static. I.P.
CAM 107	Blew 1st floor cam 1	Colour. Static/server 2
CAM 108	Blew 1st floor cam 2	Colour. Static /server 2
CAM 109	Blew 1st floor cam 3	Colour. Static /server 2
CAM 110	Ivy 1st floor cam 1	Colour. Static /server 2
CAM 111	Ivy 1st floor cam 2	Colour. Static /server 2
CAM 112	Blew 2nd floor 17-18	Colour. Static /server 2
CAM 113	Blew 2nd floor 21-25	Colour. Static /server 2
CAM 114	Blew 2nd floor fire exit	Colour. Static /server 2
CAM 115	Ivy 2nd floor cam 1	Colour. Static /server 2

CAM 116	Ivy 2nd floor cam 2	Colour. Static /server 2
CAM 117	Ivy 2nd floor 22	Colour. Static /server 2
CAM 118	Blew 3rd floor cam 1	Colour. Static /server 2
CAM 119	Blew 3rd floor cam 2	Colour. Static /server 2
CAM 120	Blew/Ivy 3rd floor link landing	Colour - Static - I.P. /server 2
CAM 121	Ivy 3rd floor cam 1	Colour - Static - I.P. /server 2
CAM 122	Blew Laundry Room	Colour - Static - I.P. /server 2
CAM 123	DT Room 3	Colour - Static - I.P. /server 2
CAM 124	North Block External Maintenance	Colour - Static - I.P. /server 2
CAM 125	Pavilion PTZ server 2	Colour - PTZ - I.P. /server 2
CAM 126	Smoking area	Colour - Static - I.P. /server 2
	Ivy/Blew College Road Front Right	Colour – Static – I.P.
	Old San Car Park	Colour – Static – I.P.
	Security Lodge Shackleton	Colour – Static – I.P.
	Wodehouse Library Archive	Colour – Static – I.P.
	Wodehouse Library Entrance	Colour – Static – I.P.
	Music Rear	Colour – Static – I.P. / Server 2

	Neds Café	Colour – Static – I.P. / Server 2
	South Cloister	Colour – Static – I.P. / Server 2
	South Block Rear (Front Lawn)	Colour – Static – I.P. / Server 2
	North Block Rear (Front Lawn)	Colour – Static – I.P. / Server 2
	Theatre	Colour – Static – I.P. / Server 2

AM 127	TBSG external rear cam 1	Colour - Static - Remote access via App
CAM 128	TBSG external rear cam 2	Colour - Static - Remote access via App
CAM 129	Boathouse Cam 1	Colour - Static - Remote access via App
CAM 130	Boathouse Cam 2	Colour - Static - Remote access via App
CAM 131	Boathouse Cam 3	Colour - Static - Remote access via App
CAM 132	Boathouse Cam 4	Colour - Static - Remote access via App