



British School
of Bucharest

VIDEO SURVEILLANCE POLICY

Introduction

For the legal information of the concerned persons regarding the utilization of the video system inside the school campus of British School of Bucharest (BSB), managed by the Crawford House Foundation, registered as data operator with The National Authority for the Supervision of Personal Data Processing (ANSPDCP), we are publishing the following information.

The legislation regarding this security measure

- Law no. 333 of 8th July 2003, regarding the security services for strategic facilities, goods, values and the protection of individuals, as subsequently amended and supplemented.
- Decision no. 301 of April 11th 2012, for the approval of Methodological Norms of Law no. 333/2003 regarding the security services for strategic facilities, goods, valuables and the protection of individuals.
- Law no. 677/2001 for the protection of individuals in relation to the processing of personal data and the free movement of such data, as subsequently amended and supplemented.
- Order no. 52 from 18th April 2002, regarding the approval of the Minimum security requirements in the processing of personal data.
- Decision of The National Authority for the Supervision of Personal Data Processing (ANSPDCP) no. 52 from 31st May 2012, regarding the processing of personal data by using video surveillance instruments.
- The instructions of the European Authority for the Protection of Personal Data regarding video surveillance, published on 17th March 2010 in Brussels.

Aim and content of the video surveillance security measure

The Video Surveillance Policy, which can be accessed at the web address www.britishschool.ro, informs the persons concerned or potentially concerned, on the video surveillance system of the school campus managed by the data operator CHF, the protective measures taken by the campus in order to protect personal data processed by means of video cameras, as well as on the rights of the persons concerned regarding the personal data processed.

The Purpose for monitoring the access into the BSB school campus, by video surveillance, is done in order to ensure greater security control and security services, particularly in order to ensure the safe guarding of pupils, employees and property of the school campus.

The video surveillance system was implemented based on a risk analysis regarding physical security, as well as CHF's duty to comply with its obligations under law no. 677/2001, regarding the processing of personal data, particularly the collecting, managing and deleting of these data, as well as regarding the information of the concerned persons on the rights they have in relation to their personal data, processed by CHF. In this regard, the CHF personnel is instructed, among others, on the minimum security requirements in the processing of personal data, as well as on the necessity to preserve confidentiality on the data processed by virtue of job responsibilities, laid down in the job description.

The risk analysis is periodically revised, by the authorities responsible for security assurance, by re-evaluating:

- the necessity to maintain the system in use.
- meeting the declared purpose;
- potential adequate alternatives to the system and (d) whether this policy continues to observe the Law no. 677/2001.



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CHF uses the video surveillance system for security and access control purposes. Thereby ensuring that access to the School Campus is controlled, the safety of goods and the security of persons - pupils, employees, visitors, as well as of the movable and immovable goods, information regarding personal data and the teaching activity management - within the School Camp are protected.

The video surveillance system compliments the other physical security measures, such as physical guardianship and is part of the measures taken under the risk management policy, incorporated by the operator CHF and helps to prevent non-authorized access to the school campus, including the unauthorized access of certain employees to the secured enclosures and the protected rooms. Furthermore, the video surveillance system helps to prevent and combat theft of movable goods on the school campus, to prevent and combat the risks and threats to the pupils and employed personnel, who perform their activity inside the school campus. The system can also act as an instrument for investigating or obtaining information for the internal inquiries or disciplinary procedures, including in the situations when a physical security incident occurs or an offending conduct is being observed (in exceptional circumstances, the images can be transferred to the investigating authorities within a disciplinary or criminal investigation).

The video surveillance system is not used for any other purpose than the one stated above, it does not serve to monitor the activities performed by employees or for time sheets recording purposes.

The following areas of the School Campus of The British School of Bucharest situated on 42 Iancu Nicolae, Voluntari, Ilfov, are under video surveillance:

- the pedestrian access area
- the vehicle access area
- the public relations area
- the goods storage area (library, IT room)
- the area around the building for protecting the exterior enclosures

The policy applies within the video surveillance activity, according to their responsibilities, by:

- the personnel responsible for system administration;
- the management of the institution;
- the personnel ensuring the maintenance of the surveillance systems.

The placement of the cameras was carefully planned so as to limit, as much as possible, the monitoring of those areas which are not relevant for the established purpose.

The recording device is placed in a well-protected space, secured and permanently guarded. There is no monitoring in the areas with a high level of risk to invade on personal privacy, such as the offices, toilets, dressing rooms and other similar locations.

Moreover, the system is not an instrument for investigating or obtaining information for the internal inquiries or disciplinary procedures, including in the situations when a physical security incident occurs or an offending conduct is being observed (in exceptional circumstances, the images can be transferred to the investigating authorities within a disciplinary or criminal investigation).



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Special data categories

The video surveillance system captures images from the above-mentioned areas, ensuring the quality necessary for person recognition. The storage of the recorded data is temporary and it is done only for the declared purpose.

The description and technical specifications of the system

Conventionally, the video surveillance system is a static system. Its function is the recording of images, recording which can be programmed non-stop, based on sensors - sensing movement or light changes. The system can record any movement detected by the cameras installed in the area under surveillance, as well as the data, hour and location. All cameras are functional 24 hours a day, 7 days a week.

When necessary, the quality of the images allows for the recognition of those who pass by the areas scoped by the cameras. For a better security in the processing of data that can be obtained based on video surveillance, the cameras are fixed, so that the user cannot modify the perimeter/scope of the surveillance. The system is used just for surveillance by the security personnel of the Control Room, which is a secured room, which doesn't allow the monitors to be seen from the outside. Moreover, the personnel doesn't have the right to operate the system or to consult the system recordings, but only to visualize, in real time, the screen of the monitor which displays the images transmitted by the video cameras.

Benefits of the surveillance system

- Increasing the security controlled in the perimeter under surveillance - the activity within the related perimeter of the school campus;
- Better security around the school;
- Discouraging behaviour which is inappropriate on the school campus;
- Preventing/combating violence against persons and goods;
- Controlling and monitoring visitors;

Installation, administration and operation of the system

In order to protect the security of the video system and to increase the degree of data protection, the following technical and organisational measures were implemented:

- Limitation of the storage time of the filmed material, as per the minimum security requirements stipulated by the law;
- Signing, by the users having a right of processing and access to personal data, of confidentiality clauses regarding the personal data they get to know by virtue of their job responsibilities;
- Limitation of the users' right of access to personal data, particularly to data that is not strictly necessary for carrying out each one's job responsibilities;
- Limitation of the number of users of personal data and their periodical training;

Access to personal data. The confidentiality of such data

The access to the stored images and/or the technical architecture of the video surveillance system is confined to a limited number of persons and determined based on the specific responsibilities in their job description (what kind of access and to what purpose), according to the security management policy of CHF operator.



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CHF establishes in which circumstances and to which limits the users have the right to:

- watch the filmed material in real time: the real-time images are accessible to the personnel appointed by the security company to perform the surveillance activity, with CHF approval;
- watch the recording of the filmed material: watching the recorded images shall take place in justified cases, such as those expressly provided by the law and security incidents, by specially appointed persons;
- copy, download, delete any filmed material.

Disclosure of personal data. Circumstances, limits

The possibility of disclosing personal data (images of persons captured on video) by third parties, shall be rigorously analysed by CHF, which will take into account both the necessity of communicating those data as the compatibility between the purpose for which the communication is being done and the purpose for which these data were initially collected for processing (security and access control). Any instance of such disclosure shall be recorded by the surveillance system administrator in the System Events Register.

Should offensive or criminal actions take place in the school campus, CHF shall make available to the judicial authorities, on their written request, relevant video recordings for the settlement of the case.

The video surveillance system is not used to verify the presence on schedule or to evaluate the work place performance.

Any security infringement, regarding the video cameras is to be noted in the System Events Register.

Storage duration

The storage duration of data obtained by means of the video surveillance system, depends on the purpose for which the data is processed. Images are stored for a period which doesn't exceed 20 days, afterwards they are deleted by automatic procedure in the same order in which they were recorded. In case of a security incident, the storage duration of the relevant filmed material may exceed the normal limits, depending on the additional time necessary for the investigation of the security incident. The storage is strictly documented and the necessity of the storage periodically revised.

The rights of the concerned person

CHF guarantees the rights incumbent on the persons concerned, according to the law. All persons involved in the video surveillance activity and those responsible for the administration of the filmed images, shall comply with the Personal Data Access Procedure, established by the Security Management Policy for the Personal Data processed by CHF, as the case may be, under penalty of disciplinary, civil or criminal liability.

The information of the persons concerned

The areas under video surveillance will be marked by means of an appropriate sign, with sufficient visibility and localized in the area under surveillance, so as to signal the existence of the surveillance camera, but also in order to communicate the essential information regarding the processing of personal data.

The persons concerned are warned of the existence of the video surveillance system and its owner by appropriate information notes, containing the purpose of the processing and identifying CHF as operator of the data collected by means of the video surveillance



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Exercising the rights of access, intervention and opposition

Over the entire period of processing by CHF of the personal data, the persons concerned have the right to request intervention (deletion/updating/correction/making anonymous) or to oppose the processing of their personal data, according to the law. Any request to access, correct, block and/or delete personal data as a result of the utilization of video cameras must be addressed to CHF, by the secretariat department from 42 Iancu Nicoale, Voluntari, Ilfov.

The answer to the request is formulated and sent to the concerned person within 15 calendar days. Should this term be exceeded for justified reasons, CHF shall communicate to the concerned person the reason for which the answer is delayed.

On the concerned person's express request, CHF may allow her/him to watch the recorded images which concern her/him or it may send her/him a copy thereof. The images provided shall be clear, as much as possible, without prejudice to the rights of third parties (the concerned person shall be able to watch just his/her own image, the images of other persons who may appear in the recording shall be edited in such a way so as to make impossible their recognition/identification). In case of such a request, the concerned person has to identify herself/himself beyond any suspicion (present the identity document when participating at the watching), to mention the data, hour, location and circumstances in/at which s/he was recorded by the surveillance cameras. Furthermore, the concerned person shall also present a recent photo, so that the appointed users can identify her/him easier in the filmed images.

Right of access may be denied in a situation where the exceptions provided by the law apply. Access could also be limited in case of an obligation to protect the rights and liberties of third-party persons, for instance if in the images other persons appear and it is impossible to obtain their consent or if the irrelevant personal data can't be extracted by editing the images.

In order to submit a claim regarding the non-observance of the rights guaranteed by Law no. 677/2001, the concerned persons can turn to CHF, by the Secretariat, at the address 42 Iancu Nicolae, Voluntari, Ilfov; if the claim is not solved, they can turn to the National Authority for the Supervision of Personal Data Processing or/and the courts of law.

Contact data of the National Authority for the Supervision of Personal Data Processing: Address: 28-30 Gheorghe Magheru Avenue, 1st District, Postal code 010336, Bucharest, Romania, Tel: +40.318.059.211; +40.318.059.212; Fax: +40,318,059,602

Reviewed by Andrei Voicu

Security Manager

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