

CCTV POLICY INTRODUCTION

The Sixth Form College has installed Closed Circuit Television (CCTV) to provide a safe and secure environment for students, staff and visitors and to protect College property. This Policy and Protocol sets out the College approach to the use of CCTV and has due regard to the UK General Data Protection Regulation (GDPR) and the UK General Data Protection Act 2018 (DPA).

Although not a relevant authority, the College will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 (updated 2021) and in particular the 12 guiding principles contained therein.

This policy is based upon guidance issued by the Information Commissioner's Office,

This policy and procedures, applies to all of the College's CCTV system, covert installations and any other system capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

Purpose of the CCTV System.

CCTV has been installed on the College site

- in order to safeguard both individuals and property.
- For the prevention, reduction, detection and investigation of incidents and crime.
- To ensure the safety of staff, students, visitors and contractors
- To assist in the investigation of suspected breaches of College regulations
- To monitor traffic and delivery incidents.

The CCTV system will be used to observe the College site and access to the site. Any investigation should be proportionate to the event witnessed.

The College seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

Monitoring and Recording

The cameras are positioned in order to ensure coverage of the site and site entrances (including public areas).

Images will be viewed by named individuals, who have been trained in their use; images will normally be retained for one month and will not be shared with third parties, unless the College is legally required to share such images or when it is reasonable to do so, i.e. to provide evidence of an incident, to establish an event for an internal investigation, and for legal/insurance reasons

Individuals have a right to access personal images (applications to view images to be made in writing and may require a payment of £10).

PROTOCOL

1. The information management group are responsible for the implementation of policy and procedures relating to CCTV.
2. Daily operational management will be the responsibility of the Senior Manager with responsibility for premises who will report directly to the Principal and through him to the Governing Body of the College.
3. Named individuals will be trained in the use of the equipment and ensure that images are kept secure. Monitors displaying images will only be viewed by designated personnel.
4. The equipment has been sited in an appropriate way to ensure that it only monitors the areas intended.
5. Appropriate signs have been positioned across the site to ensure that the existence of security cameras on site has been brought to the attention of site users.
6. The contact point noted on the signs will be available from 8.00 am until 5 pm during working days and College term times.
7. Cameras will be well maintained and in the event of malfunction will be fixed within a calendar month
8. Any proposed new CCTV installation will be subject to a Privacy Impact Assessment.
9. Images will be retained for no longer than one month, at the end of this period images will be erased.
10. Disclosure of images will only take place in limited and prescribed circumstances and only with agreement from an appropriate Senior Manager. Reasons and details of disclosure will be noted formally.
11. Requests for disclosure of images must be in writing and addressed to the AP- Risk management. Responses to such requests will be made within 15 working days.
12. Requests for disclosure of images will be recorded together with the decision to disclose or otherwise and the reasons relating to that decision.
13. If images are disclosed to a third party, e.g. the police, for evidential reasons, a signature and receipt should be required before such images are handed to the third party. In the intervening period, the College will ensure that images are secure and notes are attached detailing reasons for the retention of the image and the crime incident number.
14. Access to recorded images will be restricted to the appropriate Senior Manager as delegated by the Principal.

15. All images recorded by the CCTV system remain the property and copyright of the College.
16. Covert recording will only take place if informing the individuals concerned would seriously prejudice the reason for making the recording and where there is reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

Compliance with Data Protection Legislation

Due regard is given to the data protection principles embodied in the UK General Data Protection Regulation (GDPR) and the UK General Data Protection Act 2018 (DPA). These principles require that personal data shall be:

- a) Processed lawfully, fairly and in a transparent manner;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- g) not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.

The College has identified the lawful basis of legitimate interest for processing/ using CCTV. Information regarding the use of CCTV will be publicised so that site users are aware that it is in operation and what areas this covers.

Applications for Disclosure of Images Applications by Individual Data Subjects

Requests by individual data subjects for images relating to themselves "Subject Access Request" should be submitted in writing to the College's Data Protection Officer (DPO)

Sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

Where the College is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual

has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Access to and Disclosure of Images to Third parties

A request for images made by a third party should be made in writing to the DPO

In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

Such disclosures will be made at the discretion of the DPO, with reference to relevant legislation.

Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the DPO may provide access to CCTV images for use in staff disciplinary cases.

DPO may provide access to CCTV images to Investigating Officers when sought as evidence in relation to student discipline cases.

A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

Retention of images

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 1 month from the date of recording. Images will be automatically overwritten after this point.

Where an image is required to be held in excess of the retention period referred to an Assistant Principal or their nominated deputy, will be responsible for authorising such a request.

Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.

Access to retained CCTV images is restricted to the Assistant Principal's and appropriate Senior Manager and IT technicians.

Complaints procedure

Complaints concerning the College's use of its CCTV system or the disclosure of CCTV images should be made in writing to the DPO at DPO@colchsfc.ac.uk

Monitoring Compliance

All staff involved in the operation of the CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.