

CCTV Policy

1. Introduction

The purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television)

CCTV systems are installed in premises for the purpose of enhancing security of the buildings and its associated equipment as well as creating a mindfulness among the occupant, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the day and night hours each day.

CCTV in the College is intended for the purposes of:

- Protecting the College buildings and assets
- Promoting the health and safety of staff, students and visitors as well as monitoring student behaviour
- Preventing bullying
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- Supporting the police in a bid to deter and detect crime
- Assisting in identifying, apprehending and prosecuting offenders
- Ensuring the College expectations are being followed so the College can be properly managed.

The system does not have sound recording ability.

The CCTV system is owned and operated by the College.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities. All employees are aware of the restriction in relation to access to, and disclosure of recorded images.

2. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The College complies with The Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be clearly and prominently placed at the main external entrances to The College.

In areas where CCTV is used, the College will ensure that there are prominent signs placed within the area. The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies and related legislation. Video monitoring of public areas for security purposes

within College premises is limited to uses that do not violate the individuals reasonable expectation to privacy. Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of student of the College. All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the College.

CCTV monitoring will never be used in any observing or monitoring of staffs performance.

Recognisable images captured by CCTV systems are 'personal data', They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

3. Location of Cameras

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated. The college will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation. The college will make every effort to position the cameras so that their coverage is restricted to the College premises, which includes both indoor and outdoor areas.

CCTV video Monitoring and Recording of Public Areas may include the following:

- Protection of College buildings and property; the buildings perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms.
- Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control
- Criminal Investigations (carried out by the police): Robbery, burglary and theft surveillance

4. Access to CCTV images

Access to recorded images will be restricted to the staff authorised to view them and will not be made widely available. Supervising the access and maintenance of the CCTV system is the responsibility fo the Principal. The Principal may delegate the administration of the CCTV system to another member of staff. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need to know basis.

5. Subject access Request

Individuals have the right to request CCTV footage relating to them selves under the Data Protection Act and GDPR.

Please see separate Subject Access Request Policy and Procedure

The applicant may view the CCTV footage if available.

The College reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

6. Access and Disclosure of Images to Third Parties

There will be no disclosure or recorded data to third parties other than authorised personnel such as the Police.

If an order is granted by a Court for disclosure of CCTV images, then this would be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to the disclosure, then the Data Protection Officer should be contacted in the first instance at DPO@s6f.org.uk and appropriate legal advice may be required.

7. Responsibilities

The Principal will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV for safety and security purposes within the College.
- Ensure that all existing CCTV monitoring systems will be evaluated for the compliance with this policy.
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both staff and students feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the College and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are no-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that images recorded are stored securely and for no longer than is necessary unless required as part of a criminal investigation or court proceedings (criminal or civil)
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

Responsible for Monitoring & Review: HR Manager / DPO