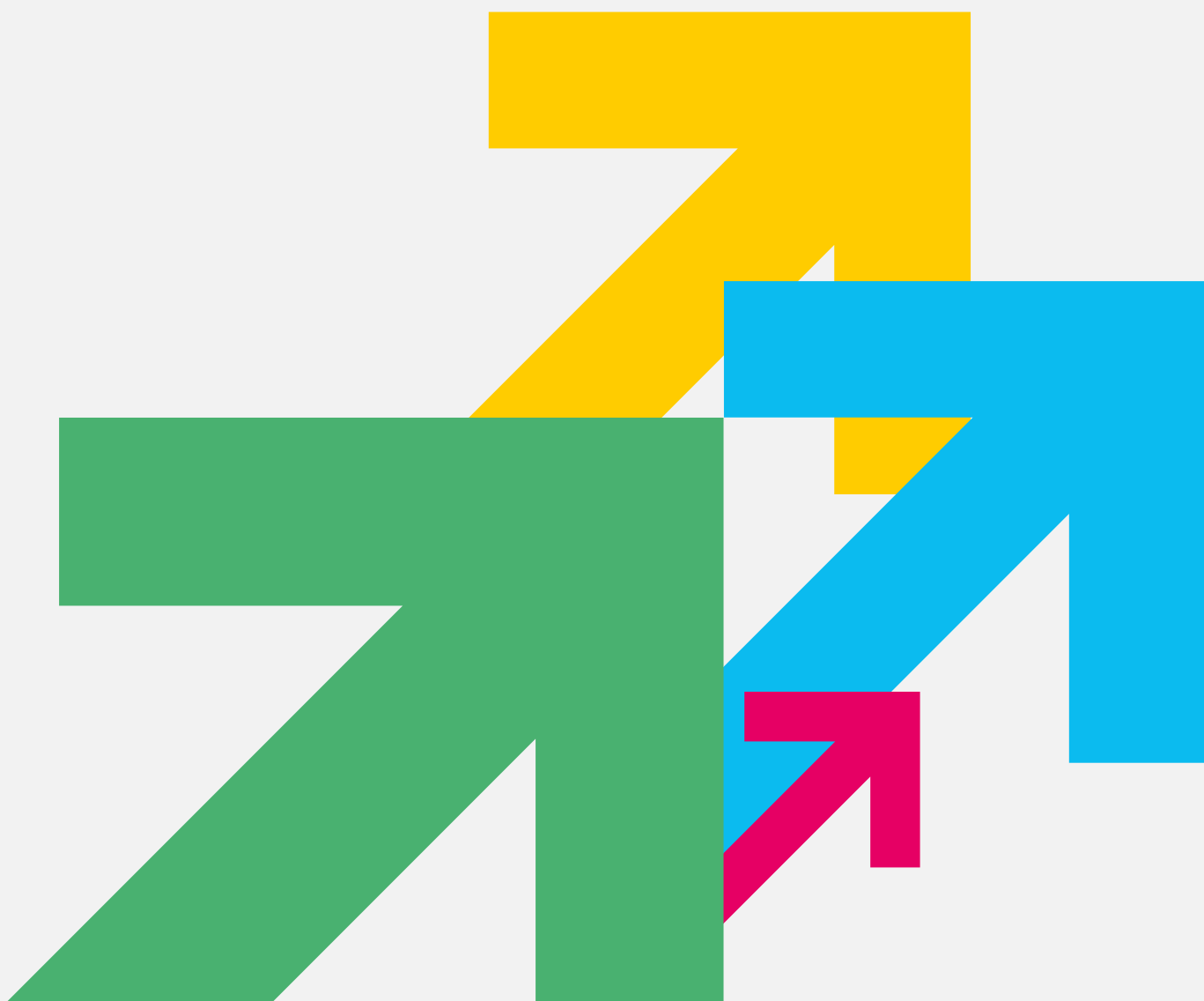


CCTV Policy

July 2024

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Introduction

The South Thames Colleges Group is fully committed to operating a safe environment, it therefore has in place a closed-circuit television (“CCTV”) system to assist in providing a safe and secure environment for students, staff and visitors, as well as protect Colleges Group property.

CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act. The person ultimately responsible for data protection within the Colleges Group is the Deputy CEO.

The system comprises a number of fixed and dome cameras located both internally and externally around the College sites. All cameras are monitored and are only available for use by approved members of staff. The CCTV system is owned by the South Thames Colleges Group and will be subject to review on an annual basis.

The purpose of this Policy is to regulate the management, operation and use of the CCTV system at the colleges. This document sets out the accepted use and management of the CCTV system and images to ensure the College complies with the Data Protection Act, The Protection of Freedoms Act, The Surveillance Camera Code of Practise and other relevant legislation.

The College has produced this policy in line with the current Information Commissioner’s [CCTV Code of Practice](#) and the [Home Office Surveillance Camera Code of Practice](#).

Purpose of CCTV

The South Thames Colleges Group has installed CCTV systems to:

- Protect College buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption
- To increase the personal safety of staff and students and reduce the fear of physical abuse, intimidation and crime.
- To support the Police in a bid to deter and detect crime.
- Assist in prevention and detection of crime.
- Assist with the identification, apprehension and prosecution of offenders.
- Assist with the identification of actions/activities that might result in disciplinary proceedings against staff and students.
- Assist in the usage and management of the College buildings on a day-to-day basis.
- Provide management information relating to Contract Compliance of 3rd party service providers.
- Monitor security of campus buildings.
- Identify vehicle movement problems around the campus.

The system will be provided and operated in a way that is consistent with an individual’s right to privacy.

Covert Recording

Prior to authorisation the requesting applicant must have demonstrated and documented that all reasonable procedures and practices were put in place to prevent suspected illegal or unauthorised activity from taking place. 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 illegal or unauthorised activity.

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 Colleges Group Legal Team may be involved in

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approving and assessing the need for covert recording in all instances. Covert cameras may be used under the following circumstances on the written or electronic authorisation of the Deputy Principal.

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording.
- That there is reasonable cause to suspect that illegal activity is taking place or is about to take place or unauthorised activity is taking place; that may seriously or substantially affect the operation or reputation of the College.

Unless required for evidential purposes or the investigation of crime or otherwise required by law, covertly recorded images will be retained for no longer than 31 days from the date of recording. A record of data destruction will be made in confirmation on the authorised request to make covert recordings.

The system will not be used to:

- Provide images to the world wide web
- Record sound
- Disclose to the media

Operation

The CCTV surveillance system is owned by the College. The Facilities Manager for each site is responsible for the day-to-day operation of the system and ensuring compliance with this policy. The Security staff will hold an SIA CCTV Licence. The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act 2018 and the Commissioner's Code of Practice.

Cameras will be used to monitor activities within the College buildings, the car parks and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants within the College grounds, together with its visitors. Static cameras will not focus on private homes, gardens and other areas of private property. Operators of cameras with tilt and pan and zoom capability will not direct cameras at an individual, their property or a specific group of individuals, without verbal authorisation from the Facilities Manager or Head of Facilities.

Materials or knowledge secured as a result of CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.

The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at access routes and areas covered by the college CCTV System.

Image Viewing and Download Procedure

- Recordings may be viewed by the police and authorised officers.
- Permission to do this will be given as follows by;

The site Facilities Manager or Head of Facilities – student, visitors / public incidents.

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Principal or Deputy Principal – staff incidents.

- Should a download be required as evidence, an electronic copy may only be made by a holder of a SIA CCTV Licence.
- Where this is to be released to the Police this will only be released to the Police on receipt of Data Release Form and sight of their warrant card.
- Where this is requested by Principal and Deputy Principal a CCTV Request Form will be completed and given to the site Facilities Manager or Head of Facilities.
- Where this is requested by Head of College/ Duty Manager / Investigating Officer investigating into a student incident a CCTV Request Form will be completed and given to the site Facilities Manager or Head of Facilities.
- Where this is requested by other parties, a CCTV Request Form will be completed by the Director of Facilities and given to the site Facilities Manager. A fee of up to £100 may be charged by the Director of Facilities for this service.
- All requests for downloads will be retained by the Site Facilities Manager for 12 months or after the incident that the download relates to has been closed.

Breaches of this Policy

Any suspected breach of this Policy by Group staff will be considered under the Group's Disciplinary Policy and Procedures.

Overview of System

The CCTV system runs 24 hours a day, 7 days a week but images are recorded on most devices when motion is detected, therefore recordings will not be continuous. The CCTV system comprises fixed position cameras; pan tilt and zoom cameras; monitors; multiplexers; digital recorders and public information signs. CCTV cameras are located at strategic points on site, principally at the entrance and exit point for the site and various buildings, as well as main thoroughfares throughout the site. CCTV signs will be prominently placed at strategic points and at entrance and exit points of the campus to inform staff, students, visitors and members of the public that a CCTV installation is in use, its purpose and details of the operator.

Although every effort has been made to ensure maximum effectiveness of the CCTV system; it does not cover all areas and it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

Data Protection Act

For the purpose of the Data Protection Act, South Thames Colleges Group is the data controller.

- CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act 2018. This policy is associated with the College's Data Protection Policy, the provisions of which should be adhered to at all times.
- The College has registered its processing of personal data (including CCTV) with the Information Commissioner's Office (ICO).

Where new cameras are to be installed on College premises, Part 4 of the ICO's CCTV Code of Practice will be followed before installation:

- The appropriateness of and reasons for using CCTV will be assessed and documented;
- The purpose of the proposed CCTV system will be established and documented;
- Responsibility for day-to-day compliance with this policy will be established and documented;

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Access to Images

Individual Access Rights

The Data Protection Act gives individuals the right to access personal information about themselves, including CCTV images.

All requests for access to view/copy CCTV footage by individuals should be made in writing to the Director of Facilities.

Requests for access to CCTV images must include:

- The reason for the request
- The date and time the images were recorded
- Information to identify the individual, if necessary
- The location of the CCTV camera
- Proof of Identity

The College will respond promptly and at the latest within 30 calendar days of receiving the request processing fee, determined by the Director of Facilities and sufficient information to identify the images requested. If the College cannot comply with the request, the reasons will be documented. The requester will be advised of these in writing, where possible.

Access to Images by Third Parties

Unlike Data Subjects, third parties who wish to have a copy of CCTV images (i.e. images not of the person making the request) do not have a right of access to images under the DPA, and care must be taken when complying with such requests to ensure that neither the DPA, HRA or the CCTV Policy are breached. As noted above, requests from third parties will only be granted if the requestor satisfies the following criteria:

- Prosecution agencies and their Legal Representatives
- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry)
- Insurance Companies and their Legal Representatives

All third party requests for access to a copy of CCTV footage should be made in writing to the Director of Facilities. A law enforcement or prosecution agency requesting access they should make a request under Section 29 of the Data Protection Act 1998.

Retention and Disposal

Recorded images will be retained for no longer than 31 days from the date of recording, unless required for evidential purposes or the investigation of crime or otherwise required and retained as a download with the requisite approval form.

All images on electronic storage will be erased by automated system overwriting. All downloads, still photographs and hard copy prints will be securely disposed of as confidential waste. The date and method of destruction will be recorded on the bottom of the original approval to copy held by the Security Manager.

Central Responsibilities

The Director of IT Services is responsible for producing and reviewing this Policy.

The SLT is responsible for approving this Policy.

The Director of Facilities is responsible for compliance with and implementation of procedures to comply with this policy.

Complaints

Complaints regarding the CCTV system and its operation should be made under the College complaints procedure.

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Forms for Use with this Policy

- Request to carry out Covert Recording
- CCTV Data Release Form

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Request to carry out Covert Recording

To: Facilities Manager
Authorised by: Principal/Deputy Principal <input type="checkbox"/>
<u>Reason for Request:</u> _____ _____ _____
<u>Location:</u> _____ _____ _____
<u>Length of Time required:</u> _____ _____

Date Requested:
Requested By:
Signature:

Facilities Manager to confirm data has been disposed of:		
Date:	Method of Destruction:	
Signed:	Print Name:	Date:

CCTV Data Release Form

To: Facilities Manager
Type of request for images relating to:
Staff <input type="checkbox"/> Student <input type="checkbox"/> Public <input type="checkbox"/>
Authorised by: Principal/Deputy Principal <input type="checkbox"/> Head of College/Duty Manager/Investigating Officer <input type="checkbox"/> Director of Facilities <input type="checkbox"/>
<u>Incident Date/Time and brief description of required incident:</u>

Date Requested:
Requested By:
Signature:

Facilities Manager to confirm data has been disposed of:		
Date:	Method of Destruction:	
Signed:	Print Name:	Date: