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CCTV POLICY

Introduction

Bodens College of Performing Arts 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 to protect college 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 2018. The senior management team are ultimately responsible for data protection within the college.

The purpose of this policy is to regulate the management, operation and use of the CCTV system at the college. 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 2018, Human Rights Act 1998 and other legislation.

The college has produced this policy in line with the ICO's code of practice <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

The system will be provided and operated in a way that is consistent with an individual's right to privacy and in accordance with the college GDPR policies and privacy notices which are available at <http://www.bcepolicies.com/public-documents/>

Purpose of CCTV

Bodens College of Performing Arts has installed CCTV systems to:

- Protect college buildings and assets, and ensure they are kept free from intrusion, vandalism, damage or disruption.
- Increase the personal safety of staff and students and reduce the fear of physical abuse, intimidation and crime.
- Support the police in a bid to prevent and detect crime.
- Assist with the identification, apprehension and prosecution of offenders.
- Assist with the identification of actions or 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 third party service providers.
- Monitor security of campus buildings.
- Identify vehicle movement or parking problems around the campus.

Overview of system

The system comprises a number of fixed cameras located both internally and externally around college sites. All cameras may be monitored and are only available for use by approved members of staff.

The CCTV runs continuously and comprises fixed position cameras, digital recorders and public information signs.

CCTV cameras are located at strategic points on site, principally at the entrance and exit points for the site and associated buildings, as well as classrooms and areas where young people may congregate.

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.

Operation

The CCTV surveillance system is owned by the college.

The senior management team are responsible for the day-to-day operation of the system and ensuring compliance with this policy.

The CCTV system is registered with the information commissioner under the terms of the Data Protection Act 2018 and will 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 as it is occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants of the college grounds, together with its visitors.

Static cameras will not focus on private homes, gardens or 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 senior management team, unless an emergency response to events is required

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. Footage from the CCTV must not be viewed or released for the purposes of entertainment under any circumstances.

The planning and design of the existing CCTV system has endeavoured to ensure that it will give maximum effectiveness and efficiency but it is not possible to guarantee that the 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.

Viewing of live CCTV

The system allows for the viewing of live CCTV images. These images may be monitored live by the staff members named for the purposes listed above.

Image searching and download procedure

Recorded CCTV may be searched or downloaded by authorised staff members and the police only. Permission to search or download must be requested using the CCTV release form which must be submitted and approved by the person listed below **before** the CCTV is searched or downloaded. All requests and whether they were approved or denied will be logged.

Student, visitors or public incidents – requests approved by the senior management team
Staff incidents – requests approved by the senior management team

For administrative purposes such as looking for lost property the director of IT and the facilities manager only may view the recorded footage without completing a release form. The details of the viewing must be recorded on the log in the usual way.

- Members of staff authorised to make requests and search CCTV if approved
- In a police emergency the director of IT or the facilities manager may facilitate the police to view footage on sight of a warrant card. They will record the details including the warrant card information on the viewing log
- During Covid and to enable social distancing, it may be necessary to provide staff members with footage on a laptop which will be returned as soon as the footage has been viewed
- Should a download be required as evidence, an electronic copy may only be made with written authorisation from the Senior Management Team
 - Where this is to be released to the police this will only be completed on receipt of the CCTV release form and sight of their warrant card.
 - Where this is to be released to a staff member it must only be the people on the authorised list above.
 - Where this is to a third party, this must be in accordance with the procedures laid out elsewhere in this policy.
 - Where a download is approved, it must be provided on a password protected storage device which is to be returned to the IT department for the files to be destroyed on completion of the investigation.
 - Downloads should not be emailed or shared via any other means under any circumstances.
 - All requests will be logged whether they were approved or denied.

Data Protection Act 2018

For the purpose of the Data Protection Act 2018 BCT is the data controller.

If CCTV digital images show a recognisable person they are considered personal data and are covered by the Data Protection Act 2018. This policy is to be considered with the

college's GDPR and privacy 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.

Access to images – individual access rights

The Data Protection Act 2018 gives individuals the right to access personal information about themselves, including CCTV images.

Where an individual believes they have been captured on CCTV they may request those images. All requests for access to view or copy CCTV footage by individuals should be made in writing to the Senior Management Team in line with the advice at this link <https://www.gov.uk/request-cctv-footage-of-yourself>

Access to images – 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. Requests from third parties will only be granted if the requestor satisfies the following criteria:

- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry)
- Prosecution agencies and their legal representatives
- Insurance companies and their legal representatives

Access to images – procedure for third parties

Requests for access to CCTV images must include:

- Payment of £100 per application
- Completed CCTV release form
- 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
- Name and address of the requester
- Proof of identity of the requester (passport or driving licence)

The college will respond promptly and at the latest within 30 calendar days of receiving the payment and request, assuming there is sufficient information to identify the images requested.

All third-party requests for access to a copy of CCTV footage should be made in writing to the Senior Management Team.

All requests and whether they were approved or denied will be logged.

If the college cannot comply with the request the reasons will be documented. The requester will be advised of these in writing, where possible.

Retention and disposal

Recorded images will be retained for no longer than 3 months 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.

Central responsibilities

The Senior Management Team is responsible for producing and reviewing this policy. The Senior Management Team is responsible for day to day implementation of procedures to comply with this policy.

Complaints regarding operation of system

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

Breaches of this policy

Staff must not interfere or disrupt the operation of the system in any way for example by unplugging, moving or covering cameras. Any suspected breach of this policy by college staff or contractors will be considered under the college's disciplinary policy and procedure.

Last updated	Next review	Person responsible
November 2023	November 2024	KM