



# **CCTV Policy**

## **1. Policy Statement**

- 1.1 Varndean College “the College” has in place a CCTV surveillance system “the CCTV system” installed in its Surrenden Road campus. The purpose of this policy is to regulate the management, operation and use of the CCTV system.
- 1.2 The CCTV system is owned and managed by the College. Under current data protection legislation Varndean College is the ‘data controller’ for the images produced by the CCTV system. The college is registered with the Information Commissioner’s Office and the registration number is Z5163295. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner’s guidance
- 1.3 The college will comply with the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998.
- 1.4 This policy is based upon guidance issued by the Information Commissioner’s Office, ‘In the picture: A data protection code of practice for surveillance cameras and personal information’ (“the Information Commissioner’s Guidance”).
- 1.5 This policy and the procedures apply to all of the college’s CCTV systems 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.
- 1.6 All authorise operators and employees with access to images are aware of the procedures that need to followed when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to and disclosure of recorded images

## **2. Scope**

- 2.1 The college's Senior Leadership Team is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 2.2 Signs are placed at all pedestrian and vehicular entrances in order to inform staff, students, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by the college.
- 2.3 The Premises Manager is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- 2.4 Cameras will not be sited to focus on private residential areas and cameras situated in college will focus on points of entry and communal areas.
- 2.5 The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.
- 2.6 CCTV has the potential to be privacy intrusive. The College will perform a Data Protection Impact Assessment when installing or moving CCTV cameras to ensure the use is necessary and proportionate and addressing an identified need.

2.7 CCTV will not be used to monitor or observe a member of staff's performance

### **3. Purposes of the CCTV system**

3.1 The principal purposes of the college's CCTV system are as follows:

- Protecting the College buildings and assets
- Promoting the health and safety of staff, students and visitors and monitoring student behaviour
- Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- Assisting in identifying, apprehending and prosecuting offenders

3.2 The CCTV system will be used to observe the college's campus in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

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

3.4 The system does not have sound recording capability

### **4. Monitoring and Recording**

4.1 Images are recorded centrally on servers located securely at the College.

4.2 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 of the Senior Leadership Team (SLT). SLT may delegate the administration of the CCTV System to another staff member. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

4.3 Cameras may be monitored up to 24 hours per day. Out of hours, additional authorised staff may have access to live video.

4.4 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked monthly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

4.5 All images recorded by the CCTV System remain the property and copyright of the College.

### **5. Compliance with Data Protection Legislation**

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. The principles of data protection require that it shall be:

- processed lawfully, fairly and in a transparent manner;
- collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- 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;
- 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.

The college ensures it is responsible for, and able to demonstrate compliance with GDPR.

## **6. Location of cameras**

6.1 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.

6.2 CCTV will NOT be used in classrooms but in limited areas within the School that have been identified by staff and pupils as not being easily monitored. Members of staff will have access to details of where CCTV cameras are situated.

## **7. Subject Access Requests**

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

7.2 All requests should be submitted in writing to the college's Data Protection Officer "DPO" together with proof of identification at [dpo@varndean.ac.uk](mailto:dpo@varndean.ac.uk).

7.3 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, such as time, date and location.

7.4 The College will respond to requests within 30 days of receipt.

7.5 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

## **8. Access to and disclosure of images to third parties**

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

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

8.3 Requests for images should be made in writing to the Data Protection Officer

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

## **9. Retention of images**

9.1 Unless required for an investigation or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.

9.2 Where an image is required to be held in excess of the retention period referred to in 7.1, the DPO or their nominated deputy, will be responsible for authorising such a request.

9.3 Images held in excess of their retention period will be reviewed on a monthly basis and deleted if not required.

## **10. Policy review**

10.1 The college's usage of CCTV and the content of this policy will be reviewed annually. Changes to the relevant legislation or guidance may trigger interim reviews.

## **11. Related documents:**

- In the picture: A data protection code of practice for surveillance cameras and personal information <https://ico.org.uk/media/1043340/surveillance-by-consent-cctv-code-update-2015-jonathan-bamford-20150127.pdf>
- Data Protection Policy
- Data Retention Policy