

CLOSED CIRCUIT TELEVISION POLICY

1. Purpose

The objective of the CCTV Policy is to provide guidance as to good practice in the use of CCTV (closed circuit television) and to detail the controls necessary to ensure compliance with the Data Protection Act.

The purpose of closed circuit television within the College is for:

- Protecting the health and safety of employees, students and visitors on the sites;
- Monitoring the security of the sites and property thereon;
- The prevention, investigation and detection of disciplinary offences in accordance with the College's disciplinary procedures;
- The identification and disciplining of individuals who breach College policies;
- To reduce the fear of crime;
- To support the Police in a bid to deter and detect crime;
- To assist in managing the College.

2. Legislation

Legislation applicable to the closed circuit television policy includes:

- General Data Protection Regulations (GDPR)
- Data Protection Act 2018;
- Human Rights Act 1998;
- The Health and Safety at Work Act 1974;
- The Regulation of Investigatory Powers Act 2000;
- The Private Security Industry Act 2001;
- A copy of the CCTV Code of Practice which sets out the measures which must be adopted to comply with the Data Protection Act 2018 is available from the Information Commissioners (ICO) at:

<https://ico.org.uk/for-organisations/guide-to-the-general-data-protection-regulation-gdpr>

3. Responsibilities

Individual accountabilities for the implementation of the policy are as follows:

3.1 Principal & Chief Executive, supported by the Vice Principal: HR & Student Services:

- Ensure that the notification lodged with the Office of the Data Protection Commissioner covers the purpose for which this equipment is used.

4. Principles of the Policy

The principles of operation of the CCTV system are:

- The CCTV system is provided for the benefit and protection of the public and the College as a whole;
- The CCTV system will be used for the protection of people subject to harassment or intimidation, monitoring of vehicle and pedestrian traffic and the maintenance of good order in the College and for the purposes of providing evidence in disciplinary proceedings where the College regards it as reasonable to do so. It may also be used to investigate complaints and to assist in civil proceedings. Whereas the CCTV system is in place for all of these purposes, the College will not always be monitoring for all of the purposes all of the time;
- Images will be retained for evidential purposes and kept in a secure place to which access is controlled. The length of time recordings are stored on the system are identified in Appendix B.
- The system will only be used in a manner which is fair to everyone and in accordance with requirements of fairness and with the College's disciplinary procedures;
- The recording medium will be overwritten and any copies destroyed unless required as evidence in Police or internal disciplinary or civil proceedings;
- Any individual whose personal data is held by the College in the form of a CCTV recording can request access to that recording and the College will respond in accordance with GDPR and the Data Protection Act 2018.
- The College may release recordings to the Police or other authorised government agent for the purposes of the prevention or detection of crime, the apprehension or prosecution of offenders, or in the interests of national security, or in other circumstances where the College is legally obliged to do so, or in accordance with the specified purposes of the CCTV system, GDPR and Data Protection Act 2018. The identity of individuals on the recording not relevant to the investigation or the request for access will be obscured unless the individuals have given their consent. The identity of individuals on the recording whose presence is relevant to the investigation or request for access will be disclosed if they give consent for this, and may be disclosed if this consent is refused when deemed reasonable to do so in the circumstances.
- Live viewing of the system, or reviewing of recorded material prior to the production of specific recordings by approved staff of the College, namely members of the

SLT, Estates Manager, Facilities Supervisor, Security staff, and Accommodation staff (in the case of Accommodation CCTV), Advice & Guidance (in the case of the front barrier) and others, including the Police, will be permitted at all reasonable times. In these circumstances it will not be possible to obscure the identity of persons not relevant to the investigation. Under no circumstances will victims/complainants be permitted to view material in this form. Care will be taken to ensure that evidence is not compromised if potential witnesses are to view material.

- The Principal & Chief Executive shall have powers to authorise government agencies to carry out covert CCTV surveillance upon request:
 - To prevent and detect crime;
 - In the interests of public safety;
 - To protect public health;
 - To collect any tax or duty.

The College will not carry out any covert CCTV surveillance on its own or with any private agency.

In the case where the Principal & Chief Executive is involved, the Chair of Governors shall have the powers to authorise government agencies to carry out covert surveillance upon request to comply.

- The ownership of any CCTV images belongs to the College;
- The system will not be operated for personal gain by any individual or financial gain by the College;
- The equipment will be sited in such a way that it only monitors those spaces which are intended to be covered by the equipment;
- If domestic areas such as gardens or areas not intended to be covered by the scheme, border those spaces which are intended to be covered by the equipment, the College will consult with the owners of such spaces if images from those spaces might be recorded. In the case of back gardens, this would be the resident of the property overlooked;
- If cameras are adjustable by the operators, they will be restricted so that operators cannot adjust or manipulate them to overlook spaces which are not intended to be covered by the scheme;
- If it is not possible physically or electronically to restrict the equipment to avoid recording images from those spaces not intended to be covered by the scheme, then operators will be trained in recognising the privacy implications of such spaces being covered.

For example – individuals in their back gardens may have a greater expectation of privacy than individuals in their front garden.

For example – it may be appropriate for the equipment to be used to protect the safety of individuals when using card machines, but images of PIN numbers, balance enquiries, etc. should not be captured.

- Signs will be placed so that staff, students and the public are aware that they are entering a zone which is covered by surveillance equipment;
- The signs should be clearly visible and legible to staff, students and members of the public;
- The size of signs will vary according to circumstances:

For example – a sign on the entrance door may only need to be A4 size because it is at eye level of those entering the premises.

For example – signs at the entrances of car parks alerting drivers to the fact that the car park is covered by such equipment will usually need to be large, for example, probably A3 size as they are likely to be viewed from further away, for example by a driver sitting in a car.

The signs will contain the following information:

- Identity of Grantham College as the organisation responsible for the scheme;
 - The purposes of the scheme;
 - Details of whom to contact regarding the scheme.
- Monitors displaying images from areas in which individuals would have an expectation of privacy should not be viewed by anyone other than authorised employees;
 - Access to the recorded images will be restricted to designated staff (namely members of the SLT, Estates Manager, Facilities Supervisor, Security Staff & Accommodation staff – for accommodation matters). The Vice Principal: HR & Student Services (Data Protection Officer), in consultation with the Principal & Chief Executive will decide whether to allow requests for access by third parties in accordance with College disclosure policies;
 - Viewing of the recorded images should take place in a restricted area, for example, in a manager's or designated members of staff's office. Other employees, students and members of the public should not be allowed to have access to that area when a viewing is taking place;
 - Removal of the medium on which images are recorded, or the transfer of images to a portable electronic device for viewing purposes, shall be documented as follows (see Appendix A):
 - The date and time of removal;
 - The name of the person removing the images;
 - The name(s) of the person(s) viewing the images. If this should include third parties, this should include the organisation of that third party;
 - The reason for the viewing;
 - The outcome, if any, of the viewing;

- The date and time the images were returned to the system or secure place, if they have been retained for evidential purposes.
- All operators and employees with access to images shall be aware of the protocol which needs to be followed when accessing the recorded images;
- All operators shall be trained in their responsibilities under the CCTV Code of Practice issued by the Data Protection Commissioner and be aware of and comply with the CCTV Policy.

They must ensure that access to, and disclosure of, the images recorded by CCTV and similar surveillance equipment is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes. The reason(s) for disclosing copies of the images must be compatible with the reason(s) or purpose(s) for which they were originally obtained;

- All College employees with access to CCTV images shall be aware of the restrictions set out in this policy in relation to access to, and disclosure of, recorded images.
 - Access to recorded images must be restricted to those staff who need to have access in order to achieve the purpose(s) of using the equipment (namely members of the SLT, Estates Manager, Facilities Supervisor, Security staff, Accommodation staff – for accommodation areas only);
 - All access to the medium on which the images are recorded shall be documented;
 - Disclosure of the recorded images to third parties shall only be made in limited and prescribed circumstances.

For example – if the purpose of the system is the prevention and detection of crime, then disclosure to third parties shall be limited to the following:

- The Police and other authorised government agencies where the images recorded would assist in a specific criminal enquiry;
 - Prosecution agencies;
 - Relevant legal representatives as appropriate;
 - The media, where it is decided that the public's assistance is needed in order to assist in the identification of victim, witness or perpetrator in relation to a criminal incident. As part of that decision, the wishes of the victim of an incident should be taken into account;
 - People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings).
- All requests for access or disclosure shall be recorded. If access or disclosure is denied, the reason shall be documented;
 - If access to or disclosure of the images is allowed, then the following shall be documented:

- The date and time at which access was allowed or the date on which disclosure was made;
 - The identification of any third party who was allowed access or to whom disclosure was made;
 - The reason for allowing access or disclosure;
 - The extent of the information to which access was allowed or which was disclosed.
- Recorded images shall not be made more widely available – for example they shall not be routinely made available to the media or placed in the internet;
 - If it is intended that images will be made more widely available, that decision will be made by the Principal & Chief Executive. The reason for that decision shall be documented;
 - If it is decided that images will be disclosed to the media (other than in the circumstances outline above), the images of individuals not party to the investigation will need to be disguised or blurred so that they are not readily identifiable;
 - The CCTV systems will operate 24 hours each day, every day of the year.

Body Cams

The wearing of body cams by security guards is permitted when authorised by a member of the SLT. This is for their own protection and in the interest of public safety and security. Images will be stored for -----unless there is an incident that requires the images to be saved for a future prosecution.

Quality Assurance – Version Control			
Review Period:	Annually	Review carried out by:	Estates Manager
Approved by:	SLT	Date Approved:	14 January 20
Equality Impact Assessment Date:	November 19	Last Review Date:	November 19

Appendix A**CCTV OPERATIONS SYSTEM
GDPR & Data Protection Act 2018****Request from Police or other government agency for data held on CCTV**

Date & time of incident	
Details of incident	
Signature of Police Officer / Government Agency Officer	
Print name of Police Officer / Government Agency Office	
Incident report number	
Date & time of removal of images	
Name of person removing images	
Name(s) of person(s) viewing the images	
If third party viewing the images give details of organisation	
The reason for the viewing	
The outcome, if any, of the viewing	
Name of person returning images to secure place	
Date & time images returned to secure place	

Appendix B

CCTV OPERATIONS SYSTEM

Location of DVR Units 1 & 2	Public Services Office Engineering Block
CCTV type:	Digital CCTV (One 16 way + One 32 way Hybrid)
Number of cameras:	36 cameras
Coverage:	<ul style="list-style-type: none"> - Back of Engineering block, Sports Hall & Squash Court fire exit - Refectory - Refectory - Bar & stairs - Car park outside Sports Hall & Riverside House - Refectory double doors & Bar fire exit - Engineering corridor (EG.05, EG.04, EG.03, EG.02) - Front gate - Main reception - Lower ground floor fire exit near toilets - Finance Office and door leading to Aircraft Cabin - E-Learning centre - Double doors down at bottom of ramp from Nixx - Main car park - Patio Area - Secure bike store and grill - Back drive - Walkway between lower link and Hydraulic Work Shop - Minibuses and Refectory - Bike Shed - Reception in Small Animal Centre - Small Animal Centre stairs leading to Fire Exit - Outside of double door near EG.10 - Inside of double door near EG.10 - Stairs outside Estate Manager's office - Engineering Main Entrance doors and stairs with disabled lift - Corridor in Small Animal Centre leading to Fire Exit - Car Park next to Hydraulic Work Shop - Double doors in Arts Centre - Reception Desk - Outside Rm19 Overlooking Elsham Lawn & Outdoor Gym - Learning Resources Centre - Hydraulics Workshop - University Centre Common Room - Upper Link Corridor

	- Your Future room
Operational hours:	24 hours – continuous recording for 58 days
Type of recordings:	Digital
Length of time recordings stored:	58 days

Location of DVR TX1 & TX2	Stonebridge House Site
CCTV type:	Digital CCTV
Number of cameras:	18 Cameras
Coverage:	<p>Transmitter 1 (10 cameras)</p> <ul style="list-style-type: none"> - Dome camera on S/W corner of main house - Fixed camera on cell block looking to garage frontage - Fixed camera on cell block looking to drive in front of the Coach house - Fixed camera on Stonebridge Road entrance - Fixed camera on main house covering the single storey plant room - Fixed camera on main house covering the front of the Coach House - Fixed camera on the south elevation of the single storey covering the fire exit - Fixed camera on the single storey eastern elevation (south end) covering windows - Fixed camera on the single storey eastern elevation (north end) covering windows - Fixed camera covering St Catherine's Road entrance <p>Transmitter 2 (8 cameras)</p> <ul style="list-style-type: none"> - Fixed cameras on the rear of domestic houses (x2) - Fixed cameras on the front of domestic houses (x3) - Fixed camera on the street light near the St Catherine's Road entrance overlooking the area of the former Social Club. - Fixed camera on the gable end of the Coach house overlooking the building site for building 20 - Fixed camera on the western elevation of the single storey covering the cycle compound and entrance steps to R & R.
Operational hours:	24 hour continuous
Type of recordings:	Digital
Length of time recordings stored:	84 days

Location of DVR 1	Accommodation Officer's office, Sedgwick Hall
CCTV types:	Analogue CCTV and Digital CCTV
Number of cameras:	4 cameras analogue and 7 cameras digital
Coverage:	<p>Analogue</p> <ul style="list-style-type: none"> - Top floor double doors - Top floor leading to bridge - Ground floor exit doors - Ground floor corridor and stairs <p>Digital</p> <ul style="list-style-type: none"> - 6 corridor to rooms - Facing office
Operational hours:	24 hours – continuous recording for 7 days
Type of recordings:	Digital
Length of time recordings stored:	7 days

Location of DVR 1 :	Automotive staff room Belton Lane
CCTV type:	Digital CCTV
Number of cameras:	3 cameras
Coverage:	<ul style="list-style-type: none"> - Rear Car Park - Front Door & Gate - Students' break out room
Operational hours:	24 hours – continuous recording
Type of recordings:	Digital
Length of time recordings stored:	7 days