

CCTV POLICY

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Associated Documents			



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Introduction

Telford College (the College) places the health, safety and welfare of its students, staff and visitors as an extremely high priority. CCTV is now widely used within the Further Education sector to aid the provision of a safe environment.

The College will operate CCTV within all legal and regulatory requirements, specifically:

- GDPR – 25th May 2018 - <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>
- Data Protection Act 2018
- The Surveillance Camera Code of Practice (2013) https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/282774/SurveillanceCameraCodePractice.pdf
- Freedom of Information Act 2000
- Other relevant legislation

Scope

The purpose of CCTV is to protect the safety and property of the College community and to deter crime. Safety and security purposes include but are not necessarily limited to:

- Protection of all College users, including students, staff, visitors and contractors
- Protection of College property and equipment
- Patrol of common areas and external areas outside normal College opening hours
- Investigation of serious disciplinary procedures
- Investigation of criminal activity

Process/Procedure

All CCTV systems are owned and operated by the College and their contracted security guarding provider.

The following staff has specific responsibilities for the CCTV system as listed below:

- Data Protection Officer with regards to training of staff on the viewing of CCTV.
- Estates and IT
 - **Contracted Security Staff** - Day to day operation of the CCTV system following the 'The Surveillance Camera Code of Practice (2013)' overseen by the Director of Estates.
 - **Contracted Security Staff** - Liaison with security officers who operate the system with regards to operation and the viewing of CCTV images to designated staff members as outlined in the 'Access to Images' section of this document.
 - **IT Department and Estates** - Overseeing maintenance, system upgrades and risk assessments of camera placements is against the ICO 'cctv-code-of-practice' and overseen by the IT Department and Director of Estates.

Operation of CCTV

College users are informed of the CCTV system by way of notices in entrance areas to all campus buildings and other prominent social spaces. Students are also made aware of the CCTV system during their Induction at the commencement of their course.

The CCTV system operates via the College IT network on a separate server. Unless required for evidential purposes images are retained for 30 days on Telford College and on Kickstart premises, after which they are automatically overwritten. Kickstart images are captured on site at 11 Tan Bank, Wellington, but only viewable at main site by Security staff.

CCTV system configuration is for internal use only by security staff that are qualified to operate CCTV.

Cameras are checked weekly by the College's contracted security team. Faults are logged via the IT/Site Services help desk, or directly with the Director of Estates.

Periodic specialist servicing and maintenance is carried out by Securitywise, March Way, Shrewsbury, SY1 3JE.

Operation of CCTV in the Willow Tree

The purpose built specialist centre **has three base rooms** on the support base corridor fitted with CCTV. This is live streamed to a monitor that is viewed by designated staff. It enables behaviour to be monitored by appropriate staff, doctors or occupational therapists in real time without disruption or confusion to students. Live CCTV streaming also enables assistance to be provided in the event of a behaviour incident where a second staff member may be of assistance to provide appropriate support.

The CCTV footage in the three base rooms is not recorded and complies with safeguarding and GDPR guidance.

A CCTV live stream declaration and consent form is provided to parents / carers and signed at enrolment. This signed document will be kept with the student's enrolment documentation.

Access to Images

Access to CCTV images across colleges except where it is restricted to the following staff:

- SLT/ELT Members – (requires supervision by the Data Protection Officer/security)
- Heads on Duty – (requires supervision by the Data Protection Officer/security)
- Contracted Security Team
- Willow Tree staff – restricted access real time viewing only

Should any staff member be included to assist identification purposes of individual/s in a CCTV image, a '**non-disclosure**' of events must be adhered to while the Head on Duty investigates the incident.

Any verbal requests for access to images should be agreed verbally and approved in writing to the Data Protection Officer and/or Head of MIS, Reporting and Systems using the correct form:

For internal use:

Appendix 1 Form LS-Q-024 (Viewing of CCTV images)

For external use:

Appendix 2 Form LS-Q-025 (Image Provision to Third Party)

The location for viewing images under these circumstances will be:

- Security Office (A022)
- Willow Tree (Restricted viewing of Willow Tree cameras by designated Willow Tree staff only)

Data Protection Act 2018 & GDPR

Any request made by an individual, i.e. a member of the public or Student for CCTV footage will require a 'Subject Access Request' form, please note that any disclosure of events will be in written form in the first instance.

Any request by the police to view CCTV would require their form filled out prior to disclosing any CCTV footage which is called the '**Request to external organisation for the disclosure of personal data to the police – Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1)(d) & 9(2)(c)**'.

Any disclosure of CCTV footage that includes student and or members of the public will require their consent before it is released to any other third party.

Covert CCTV Surveillance

Covert or directed surveillance can only be carried out with the permission of the Principal or under instruction from the police. Covert surveillance would only be targeted at obtaining evidence when there are grounds for suspected criminal activity and that notifying the individual of the monitoring would prejudice its prevention or detection.

Under no circumstances would cameras be placed in areas which would reasonably be expected to be private (e.g, toilets/washrooms).

Appendix 1 – Viewing of CCTV images

Date of Viewing	Time	Camera	Operator

Reason for viewing	
Permission Granted by:	Position:
Outcome if any	

Name(s) of Person viewing	Signature	Organisation Details

Please be aware that signing the above you are bound to 'non-disclosure' of events whilst the Head on Duty investigates the incident.

Appendix 2 – Image Provision to Third Party

Date of Incident		Description	Outcome
Time of Incident			
Camera Identifier			
Operator			

Original to be provided, copy to be retained		Copy to be provided, Original to be retained	
Reason for Provision			
Date of Creation	Time of Creation	Operator	Camera Identifier
Crime / Incident no / Reason for Access			
Police Officer / 3 rd Party name			
Police Station / 3 rd Party Address			
Telephone number		Date of Handover	
Signature			
Date of destruction / return	Method of Destruction	Operator	



CCTV Live Stream declaration

We are delighted to welcome you to our Telford College community.

Ensuring the safety of all our students and staff is of paramount importance to us that complies with safeguarding guidance.

In our purpose built, specialist centre at the Willow Tree we have a support base corridor that offers additional security and safeguarding measures to maximise student safety.

To comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (May 2018), consent is required before we CCTV monitor students within the Willow Tree’s base rooms only. Video footage in the three base rooms is for viewing purposes only and is not recorded onto any storage medium.

This is live streamed to a monitor that is viewed by designated staff. It enables behaviour to be monitored by appropriate staff, doctors, or Occupational Therapists in real time without any disruption or confusion to students.

Live CCTV streaming also enables assistance to be provided in the event of a behaviour incident where a second staff member may be of assistance to provide appropriate support.

CCTV Live stream parental / carer consent.

I acknowledge the use of live stream CCTV in the support base corridor of the Willow Tree and agree to the conditions of use as set out above.

Student Name..... **Student Ref**.....

Parental / Carer Name

I do/do not* give consent (please sign)
*delete as applicable

Address

Telephone number

Date

Data Privacy Notice

Under the current Data Protection Act 2018 and UK GDPR the Information Commissioner’s Office Privacy Notices Code of Practice, privacy notices should be on all collection points where personal data is being collected from a Data Subject, especially if the data is being collected for a new purpose. Telford College is what’s known as ‘the data controller’ of the personal data you provide to us. We need to know your basic personal data to provide you with details regarding your interaction with Telford College. It will also be used by the college’s analysis services, where appropriate. We will not collect any personal data from you that we do not need to provide and oversee services to yourself. We will keep your basic personal data (name, address, contact details) for a minimum of 6 years (plus current year) after which time it will be destroyed. We have a Data Protection regime in place to oversee the effective and secure processing of your personal data. We shall not disclose the information you entrust us with to third parties except where we have a statutory or contractual duty to do so, where you have given prior approval or where an official Telford College third-party data sharing agreement exists. This information is not shared with third parties. If at any point you believe the information we process about you is incorrect, you can request to see this information and even have it corrected or deleted. Or if you wish to raise a complaint on how we have handled your personal data, you can contact our data protection officer who will investigate the matter for you, please email dpo@telfordcollege.ac.uk.