

CCTV Policy

Relating to: Data Protection

Document reference: SHCPoIDat04

Document owner: Head of IT and Library Services

Date of approval: 22 November 2023

Date of next review: 22 November 2024

CCTV Policy

Definitions

For the purpose of the Policy the following definitions will apply:

- 'CCTV' is Closed Circuit Television System.
- 'College' refers to St Helens College.

1.0 Scope

This policy is binding on all employees and students on all campuses of St Helens College and all employees of contracted out services. It also applies to all other persons who may be present, for whatever reason, on college property.

2.0 Ownership and Operation

The CCTV system is operated by St Helens College whose personnel are employed directly by the College. The CCTV system, all recorded material and copyright are owned by the College.

3.0 Principles

The following principles will govern the operation of the CCTV system:

- The CCTV system will be operated fairly and lawfully and only for the purposes authorised by the College.
- The CCTV system will be operated with due regard for privacy of the individual.
- Any changes to the purposes for which the CCTV system is operated will require the prior approval of the Head of Estates and the Head of IT Services.

4.0 Purpose of the CCTV System

The system is intended to provide an increased level of security within the college environment for the benefit of those who study, work, or visit the campuses.

The CCTV system will be used to respond to the following key objectives:

- Detect, prevent or reduce the incidence of crime.
- Assist with the apprehension and prosecution of offenders.
- Improve communications and the operational response of security.
- Reduce the fear of crime and create a safer environment.
- Gather evidence by a fair and accountable method.
- Assist with health and safety issues by detecting potential incidents.
- Protect the physical environment.

As confidence in the system is essential, all cameras will be operational at all times allowing for short periods for maintenance and repair. An appropriate maintenance programme is in place. All operators of the system will receive appropriate training.

5.0 System Details

The CCTV system consists of centrally controlled and monitored cameras situated on college property that monitor and record activities within key areas. The CCTV system is stored in a secure location. All access to this secure location for whatever purpose will be routinely monitored and recorded.

6.0 Installation and Signage

Cameras shall be installed in such a manner as not to overlook private domestic areas. Cameras shall not be hidden from view and signs will be prominently displayed at main entrances to the College and other key locations. The signs will indicate:

- The presence of monitoring and recording
- That images are being monitored and recorded for the purposes of crime prevention and public safety.
- Ownership of the system

7.0 General Data Protection Regulations

Where images of living, identifiable individuals are deliberately recorded, this is likely to comprise those individuals' personal data. The collection, use and storage of personal data are governed by the General Data Protection Regulations (GDPR) and the Data Protection Act 2018. The College is registered with the Information Commissioner as a Data Controller.

The College uses CCTV for the purposes detailed above. The legal basis for this processing is that it is in the legitimate interests of both the College, its staff and students and members of the public visiting campus to maintain a safe environment.

Given that any sequence of CCTV recording may include personal data, all such recordings will be treated in accordance with the Data Protection legislation.

Data subjects' rights, including a right of access to their personal data, (in accordance with Article 15 of the GDPR), will be respected where recordings are confirmed to comprise personal data. Where an individual requests access to recordings believed to be their personal data, the matter shall be referred to the College's Data Protection Officer. (DPO@sthelens.ac.uk).

8.0 Access to Live Footage and Recordings including Personal Data.

Access to Live Footage

Images captured by the system will be monitored in a self-contained secure room. For operational purposes, and in accordance with the stated purposes of the system, the live CCTV footage is only monitored by designated staff, trained in their duties.

Non-essential access to the CCTV secure room is controlled.

Access to Recordings

For operational purposes and in accordance with the stated purposes of the system, only designated staff shall have primary access to CCTV recordings. Access may be granted to the police if appropriate and the requisite data release form is completed.

The Head of Estates or nominee may permit the viewing of the CCTV recorded materials by other college staff where this is necessary in connection with the purposes detailed above such as prevention of crime, assisting in the apprehension and prosecution of offenders, or enforcing College policy.

Where college staff or any other person requires access to CCTV recorded materials that contain identifiable individuals for any other purpose, then a CCTV request form must be completed, and the matter referred to the Head of Estates and the Data Protection Officer.

Disclosure of Recorded Material

As the main purpose of the CCTV system is to prevent crime and assist in the apprehension and prosecution of offenders, designated staff may release CCTV recorded materials to the police where the College has initiated contact with the police and there is a reasonable belief that the CCTV recorded materials will be of assistance.

Where the police or other official body with prosecuting powers approach the College and request access to CCTV recorded materials, they shall be asked to provide appropriate documentation confirming that the information is necessary for either the prevention of crime or the apprehension or prosecution of offenders or is necessary in connection with legal proceedings.

In all cases where recorded materials are disclosed outside the College, the Data Protection Officer shall ensure that the disclosure is logged and duly signed for.

9.0 Retention of Recorded Materials and Disposal

CCTV recordings and other materials produced from them shall be retained for a maximum of 30 days unless an incident is recorded that requires further investigation either by the College or the police or another external body with prosecuting powers.

In the latter case, recordings shall be kept for a longer period as determined by the nature of the investigation.

All media that are no longer required, on which recordings were made will be securely and permanently destroyed.

10.0 Breaches of Code

A copy of this Policy will be made available to anyone requesting it. Any complaint concerning misuse of the system will be treated seriously and dealt with in accordance with the College's complaints procedures.

Any member of staff found to be in breach of this Policy shall be dealt with in accordance with the College's staff disciplinary procedure. Where appropriate, the police will be asked to investigate any matter relating to the CCTV system, which is deemed to be of a criminal nature.

11.0 Contact Details

Questions about the operation of the CCTV system, should be directed to the Head of Estates in the first instance.

Questions relating to data protection should be addressed to DPO@sthelens.ac.uk in the first instance.

Individuals have the right to lodge a complaint against the College regarding data protection issues with the Information Commissioner's Office.