



# Thriftwood School and College

## SEAX TRUST Thriftwood College GDPR CCTV Policy

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## 1. Introduction

Thriftwood College uses closed circuit television (CCTV) images to reduce crime and monitor the college buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent loss or damage to the college property.

The system comprises of a 16 channel system, with 8 cameras in operation, located as shown in the map below:



The system does not have sound recording capability.

The CCTV system is owned and operated by Thriftwood College, the deployment of which is determined by the Thriftwood's leadership team.

The CCTV is monitored centrally from the estate managers office by David Halliday, Estate Manager.

Each camera is subject to a Data Protection Impact Assessment (Risk Assessment), signed off by the Trust's DPO, which considers:

- The legal/fair processing reason for the requirement of the cameras
- The positioning of the cameras and what may potentially be captured by them
- Whether this is necessary, justified and proportionate
- Whether adequate information can be obtained through a less intrusive method in order to meet need
- Who has access to the data and for what reasons. (This should always be a minimal number of designated staff.)
- How the data is to be stored securely and the length of time for which it will be stored.

Risk Assessments are kept in accordance with the Data Retention Guidelines and updated when there is any change in use.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with staff and the college community.

Thriftwood's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act (DPA). The use of CCTV, and the associated images and any sounds recordings is covered by the DPA. This policy outlines the college's use of CCTV and how it complies with the legislation.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images and sound. All operators are trained with regard to their responsibilities under the CCTV policy. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images and sound.

## **2. Statement of Intent**

The college complies with the Government's Surveillance Camera Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use. The Code of Practice is published at:

<https://www.gov.uk/government/consultations/surveillance-camera-code-of-practice>

CCTV warning signs will be clearly and prominently placed at the front, side and rear of the college building. Signs will contain details of the purpose for using CCTV (see Appendix A). In areas where CCTV is used, the college will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The planning and design has endeavoured to ensure that the system 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.

## **3. Positioning of the Cameras**

Cameras will be sited so they only capture images relevant to the purposes for which they are 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 images captured comply with the legislation.

The college will make every effort to position cameras so that their coverage is restricted to the college premises, which may include outdoor areas.

CCTV will not be used in any areas within the college.

Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

## 4. Covert Monitoring

The college may, in exceptional circumstances, set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances authorisation must be obtained from a member of the senior leadership team.

Covert monitoring must cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles.

## 5. Storage and Retention of CCTV Images

The college retains CCTV images for 30 days. If there has been a disturbance during the recording period or if the premises/neighbouring premises have been subject to vandalism or a break-in, the college will hold the images for longer periods of time, as necessary, and share them with the police. Once checked, the images will be deleted by means of over-recording.

The college stores the CCTV images on the CCTV's internal hard-drive.

## 6. Access to CCTV Images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

## 7. The CCTV Log

A log is kept by Thriftwood College recording details of those staff members who have access to the footage and the reasons for this. The log will also record ongoing details of dates of access. A template log is available at Appendix B.

## 8. Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the GDPR.

All requests should be made in writing using the SAR Request Form to the Data Controller. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified; for example, data, time and location.

The college will respond to requests within one calendar month of receiving the request.

Before complying with the request, the college will consider:

- Whether it is specific:- individuals may be asked to further limit the amount of information requested in order to protect the privacy of third parties appearing in the footage

- Whether third parties are identifiable and, if so, how best the data can be shared
- Whether it is a possibility to blur/crop third parties before releasing the data
- Whether an alternative method can be used to supply the required information, eg witness statements

It is normal procedure for:

- The DPO to be advised of SARs relating to CCTV footage and their instructions followed
- All requests from third parties and/or external organisations involving SARs which include footage held on CCTV, to be submitted in writing, outlining the legal reason for the request. This can include where footage is requested by the Police and/or by external agencies for safeguarding purposes
- The individual requesting the SAR to be invited onto the premises to view the footage in question, rather than for them to be supplied with a copy of the footage.

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.

Please see the Subject Access Request Policy for further details.

## **9. Access to, and Disclosure of, Images to Third Parties**

There will be no disclosure of recorded data to third parties, other than to authorised personnel, such as the Police and service providers to the college, where these would reasonably need access to the data (e.g. investigators). Requests by third parties should be assessed using the colleges Third Party Request for Information Policy.

The data may be used within the college's Discipline and Grievance Procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

## **10. Complaints**

Complaints will be dealt with in accordance with the SEAX Trust Complaints Procedure.

## Appendix A: CCTV Signage

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The college is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the college
- The contact telephone number or address for enquiries.



