



CCTV Policy

Introduction

- 1.1 St Clare's, Oxford ("the College") uses closed circuit television ("CCTV") images to
 - a. Maintain a safe environment, helping to ensure the security and welfare of students, staff and visitors;
 - b. Deter and detect criminal acts against people and property;
 - c. Monitor behaviour in communal areas;
 - d. Assist the police in identifying persons who have committed an offence.
- 1.2 The system is a closed digital system and consists of a number of fixed and dome cameras.
- 1.3 Sound is not recorded by the CCTV system.
- 1.4 The CCTV system is owned and operated by the College. Its deployment is determined by the Principal and the Senior Management Group.
- 1.5 CCTV images are monitored centrally every day from the Porter's office at 139 Banbury Road by College staff between 07:00hrs and 00:00hrs, and by an external security service between 00:00hrs and 07:00hrs.
- 1.6 The introduction of, or changes to, CCTV monitoring will be subject to consultation with the Principal and the Senior Management Group.
- 1.7 The College's CCTV Scheme is registered with the Information Commissioner under the terms of current Data Protection legislation¹. The use of CCTV and the associated images is covered by current Data Protection legislation. This policy outlines the College's use of CCTV and how it complies with the Act.
- 1.8 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

Statement of Intent

- 2.1 The College complies with Information Commissioner's Office (ICO) guidance on the use of CCTV to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 2.2 CCTV warning signs are clearly and prominently placed on the outside of all College premises at which CCTV is in operation.
- 2.3 The CCTV system has been designed for maximum effectiveness and efficiency. However, the College cannot guarantee that every incident will be detected or covered and 'blind spots' may exist in the areas covered.

Siting the Cameras and Monitors

- 3.1 Cameras will be sited so they capture only images relevant to the purposes for which they have been installed, and care will be taken to ensure that reasonable privacy expectations are not violated.
- 3.2 In areas where students and employees might have heightened expectations of privacy, cameras will be installed only in exceptional circumstances when there are serious concerns for student or staff safety or of criminal activity. In those circumstances, the installation will be time-

¹ Currently the Data Protection Act 1998 but will be superseded by the Data Protection Act 2018 and the General Data Protection Regulation on 25 May 2018.

limited and subject to both a written privacy impact assessment and documented approval by either the Principal or the Bursar.

3.3 The College will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

3.4 The College will make every effort to position cameras so that their coverage is restricted to the College premises, which includes outdoor areas.

3.5 Fixed monitors are sited only in the Porters' office at 139 Banbury Road. These are positioned so that they cannot be viewed by unauthorised persons.

3.6 Images can also be monitored by authorised employees (see 'Access to CCTV images and disclosure' below) from their desktop or portable computers. They must ensure that when viewing either live or recorded CCTV images, those images cannot be viewed by unauthorised people.

Covert Monitoring

4.1 The College may in exceptional circumstances set up covert monitoring. These circumstances may include (but are not limited to):

- a. where there is good cause to suspect that illegal or unauthorised actions are taking place, or where there are grounds to suspect serious misconduct; and
- b. where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

4.2 In these circumstances a privacy impact assessment must be made and prior, documented authorisation must be obtained from the Principal or the Bursar. Covert monitoring must cease immediately following completion of an investigation.

Storage and Retention of CCTV images

5.1 Recorded data will be retained for 28 days. After this period the system will automatically delete the data. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely.

Access to CCTV images and disclosure

6.1 Access to live and recorded images will generally be restricted to members of the Senior Management Group, the Health & Safety and Security Manager, the Porters and the overnight external security service, who are authorised to view them for the purposes of maintaining security and investigating incidents. All other members of staff must obtain authorisation from the Principal or Bursar before accessing CCTV footage.

6.2 Disclosure of information from CCTV must always be consistent with the purposes for which the system was established. For example College may show images to the Police or to individuals who are the subject of the surveillance and their Parents/Carers. The College will ensure that disclosure is fair to the individuals concerned and that privacy intrusion to any third party individuals will be minimal.

6.3 Requests for disclosure of recorded images should be made to the Principal. The College has the right to refuse any request for information unless there is an overriding legal obligation, such as a court order or information access rights.

6.4 In the absence of a court order, there will generally be no disclosure of recorded data to third parties other than on request to authorised bodies such as law enforcement agencies, and to service

providers to the College where they would reasonably need access to maintain, replace or renew the CCTV system.

6.5 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.

6.6 The College will record the date of any disclosure made along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it.

Subject Access Request (SAR)

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

7.2 All requests must be made in writing to the Principal using the standard form below. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

7.3 The College will respond to requests within 30 working days of receiving the written request and fee.

7.4 The College reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

7.5 Please refer to the College Privacy Policy for more information on how to make a subject access request.

Complaints

8.1 Complaints and enquiries about the operation of CCTV within the College should be directed to the Principal in the first instance.

Breaches of policy

9.1 Breaches of this policy by employees may result in disciplinary action. Serious breaches (such as but not limited to making images public in any format) may constitute gross misconduct and result in immediate dismissal.

9.2 Breaches of this policy by third parties may result in civil or criminal proceedings.

9.3 Breaches must be reported as soon as they are suspected. Refer to the College's Data Breaches Policy for guidance on what to do.

Other CCTV systems

10.1 The College does not own or manage third party CCTV systems but may be provided by third parties with images of incidents where this is in line with the objectives of the College's own CCTV policy.

10.2 Students will travel on coaches provided by third party contractors and a number of these coaches are equipped with CCTV systems. The College may use these in establishing facts in cases of unacceptable student behaviour, in which case the parents/guardian will be informed as part of the College's management of a particular incident.

Further Information

Further information on CCTV and its use is available from the following:

- www.ico.org.uk
- General Data Protection Regulation

SMG
May 2018

CCTV FOOTAGE ACCESS REQUEST

The following information is required before the College can provide copies of or access to CCTV footage from which a person believes they may be identified.

Please note that CCTV footage may contain the information of others that needs to be protected, and that the school typically deletes CCTV recordings after 28 days.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**