

# Clifton College Closed Circuit Television Policy

## **POLICY STATEMENT**

This policy applies to Clifton College (the College). The purpose of this policy is to regulate the College's management, operation and use of the closed circuit television (CCTV) system both at its main site in Clifton and also the Beggar's Bush Sports Ground. The system comprises a number of cameras located within and around the College premises.

## **SCOPE**

This policy is aimed at members of staff, pupils and their parents and is available on request from the College office and is published on the College's website. The College's registrations Z5846821 and [MS1] ZA096087 with the Information Commissioner's Office (ICO) cover the use of CCTV. The College's register entries can be viewed on the ICO website.

## **AIMS AND OBJECTIVES**

The aims of this policy are:

- to enable the College to regulate its use of CCTV;
- to explain to staff, parents and pupils why CCTV is used by the College;
- to ensure that the use of CCTV remains a proportionate and justified response to the problems that it seeks to address.
- to ensure that data is stored securely and that appropriate protocols are in place for sharing of that data with law enforcement agencies

## **The Use of CCTV**

The College uses CCTV for the following purposes:

- to safeguard the welfare of pupils, staff and visitors;
- to protect the College, pupils, parents, staff and visitors to the College from criminal activity such as theft and vandalism;
- to increase personal safety and to reduce the fear of crime;
- to aid in the investigation of accidents and incidents and the monitoring of health and safety;
- to assist investigations of staff where disciplinary action is being considered;



- to support law enforcement agencies in the prevention and detection of crime and to assist in the identification, apprehension and potentially prosecution of offenders.

The College has decided that the use of CCTV is a necessary and proportionate measure to meet the objectives listed above and will keep this decision under review. The College appreciates that the use of CCTV impacts on individuals' privacy but this is justified because less privacy intrusive methods would not meet the College's purposes described above.

The College takes account of privacy concerns when operating the CCTV system.

### **LEGISLATION AND GUIDANCE**

- Protection of Freedoms Act 2012
- UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 2018)
- Information Commissioner's Office CCTV Code of Practice Version 1.2 20170609
- Surveillance Camera Code of Practice 2013

### **ROLES AND RESPONSIBILITIES**

The Director of Corporate Services has overall responsibility for the management and operation of the CCTV and the implementation of this policy. The Head of Data will ensure that the relevant procedures are followed, that the CCTV system is operated according to this policy and that regular audits are carried out to ensure compliance with policy.

### **RELATED COLLEGE POLICIES**

- Data Protection Policy
- Parent Privacy Notice
- Older Pupil Privacy Notice
- Younger Pupil Privacy Notice



## **MONITOR AND REVIEW**

This policy is reviewed annually.

### **1 The Operation of CCTV**

- 1.1 The College sites cameras to view only areas that need to be monitored and not private residences. CCTV is not used in areas where individuals have a higher expectation of privacy. There are no cameras in toilets, changing rooms or beyond the entrance of boarding houses, for example.
- 1.2 The cameras are positioned in a way to ensure their security and to protect them from vandalism.
- 1.3 The College ensures that cameras can produce images of the necessary clarity and quality. Images can be removed from the system so that they can be disclosed to law enforcement agencies.
- 1.4 The CCTV is operated at all times because this is necessary to meet the purposes for which it was installed.
- 1.5 The College is solely responsible for the operation of all CCTV in accordance with this policy for the purposes identified. Members of staff are not permitted to make their own recordings or install their own cameras for any purpose.

### **2 Informing Individuals about the use of CCTV**

- 2.1 The College appreciates the importance of being open and transparent about the use of CCTV.
- 2.2 The use of CCTV is brought to parents' attention by publishing this policy on the College's website.
- 2.3 There are prominently displayed signs in areas where CCTV is in operation (for example, at all access routes into and out of the College).

### **3 Maintenance of the CCTV equipment**

- 3.1 The College monitors the operation of the CCTV system by investigating any notifications or concerns regarding the functionality of the CCTV system.

### **4 Storage and security**



- 4.1 The CCTV footage is stored securely and accessed only by designated College staff. Staff authorised to access the CCTV images include members of the Information Technology, members of the Cross-College Senior Leadership Team (CCSLT), and security staff. These designated staff ensure that camera footage is not accessed by any unauthorised person, themselves only view footage for an authorised purpose.
- 4.2 To view CCTV images, staff are required to complete the [CCTV viewing request form](#), which will then be reviewed by The Head of Data. The request will then be facilitated and managed by the designated College staff member as stated above.
- 4.3 Images are viewed only in private offices by those authorised to do so with the exception of the Sports centre staff where live footage can be viewed at the reception desk of the Sports centre facilities
- 4.4 Information Technology managers, and above in reporting line, are authorised to have copy images produced in either digital or hard-copy format when for a designated and pre-approved purpose.
- 4.5 Authorised staff may allow external persons or agencies to view CCTV images only with the express permission of the Director of Corporate Services and in accordance with section 7 below.
- 4.6 Any security breach (for example any unauthorised access to CCTV footage) must be reported immediately to the Director of Corporate Services.
- 4.7 All maintenance of Information Communications Technology (ICT) or CCTV equipment which could provide access to CCTV footage will be carried out only by the designated staff.
- 4.8 Footage saved following an incident is held securely and the footage is not saved on any system which is not controlled by the College.

## 5 **Retention**

- 5.1 Compliance with data protection law means that personal data should not be retained for longer than is required for the purposes for which it was obtained.
- 5.2 Recordings are stored in the CCTV infrastructure for up to 30 days, depending on CCTV data storage utilisation, then overwritten. The Head of IT is responsible for maintaining the recordings, ensuring their security and having them overwritten within the specified time period.



5.3 This policy allows for data retention to exceed the above stated term whilst particular circumstances related to safeguarding or alleged criminal activity remain under investigation.

5.4 Data must be disposed of securely.

## **6 Subject access requests**

6.1 The Data Protection Act 2018 (DPA) allows individuals the right to access information about themselves. Members of staff are trained to recognize subject access requests and understand that such a request may cover CCTV footage.

6.2 Subject access requests that include a request for CCTV images should be referred to the Director of Corporate Services.

6.3 The College keeps a log of subject access requests for CCTV footage and records how these requests are addressed.

## **7 Disclosure to Law Enforcement Agencies**

7.1 Images from the CCTV system may be disclosed to law enforcement agencies (e.g. the Police) where the College considers such disclosure necessary (for example, for the prevention and detection of crime). Any such disclosure will be in accordance with GDPR.

7.2 Requests from law enforcement agencies should be referred to the Director of Corporate Services.

7.3 Should information be disclosed to law enforcement agencies the College records details of information disclosed: to whom and the purpose(s). A register will be kept for these purposes.

7.4 If law enforcement agencies require the College to retain stored files as evidence for future use the information will be indexed and securely stored until needed.

## **8 Other requests for information**

8.1 CCTV footage may be disclosed in other circumstances if this complies with the DPA. For example, if required by a court order or in connection with legal proceedings.

8.2 Applications received from outside bodies (e.g. solicitors) to view or release footage will be referred to the Director of Corporate Services.



- 8.3 CCTV footage is not made available to the media for commercial or entertainment purposes.

9 **Breaches of this Policy**

- 9.1 Any breach of this policy by a member of staff will be taken seriously and will be investigated by the Director of Corporate Services or a member of CCSLT acting on behalf of the Director of Corporate Services and may result in disciplinary action.

10 **Complaints**

- 10.1 Any complaints or concerns about the use of CCTV by the College should be addressed to the Director of Corporate Services. Parental complaints will be dealt with under the formal Complaints Procedure for the College.