



South Gloucestershire and Stroud College

CCTV Policy

**If you would like this document in an alternate format
Please contact the Human Resources Department**

Prepared by:	Gavin Murray
Job Title/Role:	Vice Principal
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Approved by:	SGS Senior Leadership Team
Date:	23/03/2022

MANDATORY INITIAL IMPACT SCREENING	
I have read the guidance document: Completing a Policy Impact Assessment?	✓
If this policy raises equality, diversity or inclusion concerns, the Inclusion Committee has been consulted?	✓
If this policy raises environmental or sustainability issues, the Estates Team have been consulted?	<input type="checkbox"/>
If this policy has been up-dated, please tick to confirm that the initial impact screening has also been reviewed:	<input type="checkbox"/>



Please list each College Strategic Priority that this policy is designed to address/implement:	SP.3: To enhance the quality of the experience we provide for our learners and our staff.
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EQUALITY, DIVERSITY & INCLUSION IMPACT ASSESSMENT	
Characteristic	This policy seeks to:
Age	No appreciable impact
Disability	No appreciable impact
Faith or Belief	No appreciable impact
Gender	No appreciable impact
Race or Ethnicity	No appreciable impact
Orientation	No appreciable impact
Gender reassignment	No appreciable impact
Economic disadvantage	No appreciable impact
Rural isolation	No appreciable impact
Marriage	No appreciable impact
Pregnancy & maternity	No appreciable impact
Carers & care leavers	No appreciable impact
Vulnerable persons	Safeguarding children or vulnerable adults
Please identify any sections of the policy that specifically seek to maximise opportunities to improve diversity within any of the College's stakeholder groups:	
Please identify any sections of the policy that specifically seek to improve equality of opportunity within any of the College's stakeholder groups:	
Is there any possibility that this policy could operate in a discriminatory way?	<input type="checkbox"/> x
	If you have ticked yes (red), which characteristic will be most affected? Choose an item.
If yes please confirm that the Policy has been sent for a full Equality & Diversity Impact Assessment, and note the date:	<input type="checkbox"/> Click or tap to enter a date.

Note: if the policy does not seek to increase diversity or improve equality you should go back and review it before submitting it for approval.

MAPPING OF FUNDAMENTAL RIGHTS	
Which United Nations Convention on the Rights of the Child (UNCRC), Right does this policy most protect:	Atr. 16 Right to privacy Art. 17 Access to information Art. 42 Right to know your rights
Which Human Right (HRA) does this policy most protect:	Art. 8 Right to private & family life Art. 7 No punishment without law

DATA PROTECTION & PRIVACY BY DESIGN SCREENING	
Tick to confirm that you have considered any data protection issues as part of the design and implementation of this policy; and, that implementing this policy will <u>not</u> result in the collection, storage or processing of personal data outside of official College systems:	✓
Tick to indicated that this policy has or requires a Data Privacy Impact Assessment:	✓

ENVIRONMENTAL, SOCIAL AND ECONOMIC IMPACT ASSESSMENT		
Does this policy relate directly or indirectly to any legal, regulatory environmental or sustainability standard(s)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
If so, please list them:		
Will any aspects of this policy result in:		
Reduced miles travelled or provide / improve / promote alternatives to car based transport (e.g. public transport, walking and cycling car sharing, the use of low emission vehicles, community transport, environmentally friendly fuels and/or technologies)	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Reduced waste, environmental hazards and/or toxic materials for example by reducing PVC, photocopier and printer use, air pollution, noise pollution, mining or deforestation? Or increase the amount of College waste that is recycled or composted?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Reduced water consumption?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Reduced instances of single use plastic?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Reduced use of natural resources such as raw materials and energy to promote a circular economy?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Improved resource efficiency of new or refurbished buildings (water, energy, density, use of existing buildings, designing for a longer lifespan)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Will this policy improve green space or access to green space?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Please list the sections of this policy which specifically target an improved environment:		

Will any aspects of this policy result in:		
The promotion of healthy working lives (including health and safety at work, work-life/home-life balance and family friendly practices)?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Greater employment opportunities for local people?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
The promotion of ethical purchasing of goods or services for example by increasing transparency of modern slavery in our supply chain?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Greater support for the local economy through the use of local suppliers, SMEs or engagement with third sector or community groups?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
The promotion of better health, increased community resilience, social cohesion, reduced social isolation or support for sustainable development?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>
Mitigation of the likely effects of climate change (e.g. identifying proactive and community support for vulnerable groups; contingency planning for flood/snow, heatwaves and other weather extremes)?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
The promotion of better awareness of sustainability, healthy behaviours, mental wellbeing, living independently or self-management?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>
Please list the sections of this policy which specifically target improved sustainability:		

What is the *estimated* carbon impact of this policy (in terms of tCO2e)	Increased (+tCO2e) <input type="checkbox"/>	Decreased (-tCO2e) <input type="checkbox"/>	Net Zero CO2 <input checked="" type="checkbox"/>

Mandatory initial impact screening completed by:	Gavin Murray
Date	11/10/2021
Initial impact screening supported by (Please list each individual)	Nigel Hornsby

CCTV Policy

1. Policy Intent

- 1.1. South Gloucestershire and Stroud College “the College” has in place CCTV surveillance systems “the CCTV system” across its UK campuses. This policy details the purpose, use and management of CCTV systems at the College and details the procedures to be followed in order to ensure that the College complies with relevant legislation and the current Information Commissioner’s Office CCTV Code of Practice.

2. Scope

- 2.1. When planning our CCTV surveillance systems and creating this policy, the College has had due regard to the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation; and, to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, the College has also had due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.
- 2.2. The CCTV system is owned and managed by the South Gloucestershire and Stroud College, Registered Office: SGS College, Stroud Campus, Stratford Road, Stroud, Gloucestershire GL5 4AH. Under current data protection legislation, the College is the ‘data controller’ for the images produced by the CCTV system. **The College is registered with the Information Commissioner’s Office and the registration number is Z3328997.** The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner’s guidance.
- 2.3. This policy and the procedures therein detailed, apply only to CCTV surveillance systems owned and controlled by the College. It does not cover Automatic Number Plate Recognition (“ANPR”) Licence Plate Recognition Cameras (“LPR”), body worn cameras, webcams, covert installations and any other system capturing images of identifiable individuals by or for CPM (UK Carpark Management) Ltd. Queries or concerns regarding surveillance conducted by CPM should be sent to info@uk-carparkmanagement.co.uk, telephone: 0345 463 5050
- 2.4. Information about CPM’s approach to data privacy can be found here: <https://www.uk-carparkmanagement.co.uk/privacy>
- 2.5. The Group Head of Estates is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.

2.6. CCTV surveillance systems are installed and sited to ensure that they cover the College's premises as far as is possible. Cameras are installed throughout the College's campuses including roadways, car parks, buildings, licensed premises, within buildings and externally in vulnerable public facing areas. The College has eight CCTV surveillance systems installations:

2.6.1. SGS Stroud Campus	1
2.6.2. SGS Filton Campus	2
2.6.3. SGS WISE Campus	3
2.6.4. SGS Berkeley Campus	1
2.6.5. SGS Queen's Road Campus	1

2.7. Total number of surveillance systems 8

3. Procedures

- 3.1. Signs are placed at all pedestrian and vehicular entrances in order to inform staff, learners, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by South Gloucestershire and Stroud College and a contact number for the Estates Team is provided.
- 3.2. The Group Head of Estates is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- 3.3. CCTV surveillance systems are operational and is capable of being monitored for 24 hours a day, every day of the year.
- 3.4. Any proposed new CCTV installation will be subject to a Data Protection Impact Assessment and a privacy assessment.

4. Purposes of the CCTV system

- 4.1. The principal purposes for operation CCTV surveillance systems are:
 - for the prevention, reduction, detection and investigation of crime and other incidents;
 - to ensure the safety of staff, learners and visitors;
 - to assist in the investigation of suspected breaches of College's Policies and Procedures by staff or learners or visitors; and
 - the monitoring and enforcement of traffic related matters.
- 4.2. The College always seeks to operate CCTV surveillance systems in a manner that is consistent with respect for individual privacy. The CCTV system is used to observe and monitor the College's campuses and areas under surveillance in order to identify incidents requiring a response. Any response will be proportionate to the incident being witnessed.

- 4.3. The cameras installed provide images that are of suitable quality and each camera is checked regularly to ensure that images captured are of sufficiently good value and evidential quality, that they remain fit for purpose and that the date and time stamp recorded on the images is accurate.

5. Policy Implementation

- 5.1. CCTV surveillance systems and constituent cameras are monitored by the College's Estates Team from within the Estates Team rooms and offices; which are secure areas, staffed during normal business hours.
- 5.2. The Estates Team is equipped with a licensed radio enabling staff to respond to incidents identified on CCTV monitors.
- 5.3. Images from CCTV surveillance systems are recorded securely and are viewable within the Estates Team areas by all Estates Team Staff. Additional staff may be authorised by the Group Head of Estates to monitor cameras sited within their own areas of responsibility on a view only basis.
- 5.4. All still and moving images, recorded by the CCTV surveillance system remain the property and copyright of the College.
- 5.5. In exceptional and very limited circumstances, in compliance with the declared purposes and key objectives of the CCTV Systems and the protocols governing the provision of evidence, CCTV Systems may be used for covert and targeted observation.
- 5.6. Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there are reasonable grounds to suspect that illegal or unauthorised activity is taking place.
- 5.7. This will only be sanctioned by the Principal or CEO of SGS College and in accordance with the Regulation of Investigatory Powers Act 2000 (RIPA). All such monitoring will be fully documented and will only take place for a limited and reasonable period.

6. Compliance with Data Protection Legislation

- 6.1. In its administration of its CCTV surveillance systems, the College complies with the General Data Protection Regulation (GDPR-UK) and the Data Protection Act 2018. Due regard is given to the data protection principles embodied in GDPR. These principles require that personal data shall be:
 - processed lawfully, fairly and in a transparent manner;
 - collected for specified, explicit and legitimate purposes and not further

- processed in a manner that is incompatible with those purposes;
- adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- accurate and, where necessary, kept up to date;
- kept in a form which permits identification of the data subjects for no longer;
- than is necessary for the purposes for which the personal data are processed;
- processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

7. Applications for disclosure of images

Applications by individual data subjects

- 7.1. Requests by individual data subjects for images relating to themselves “Subject Access Request” should be submitted in writing to Data.Privacy@sgscol.ac.uk together with proof of identification. Further details of this process are detailed on the College Data Privacy and Protection Policy:
https://www.sgscol.ac.uk/repository/documents/policies_and_procedures/quality/data_privacy_and_protection_policy_18_11_2020_min.pdf
- 7.2. In order to locate the images on the College’s system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified (and this will usually include two recent images of a front and side view)
- 7.3. Where the College is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Applications by third parties

- 7.4. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 7.5. Such disclosures will be made at the discretion of the Group Head of Estates, with reference to relevant legislation and where necessary, following advice from the College’s Data Protection Officer or Designated Safeguarding Lead.

- 7.6. A request for images made by a third party should be made in writing to the Group Head of Estates.
- 7.7. Where a suspicion of misconduct arises and at the formal request of the Director of People (in matters relating to Staff) or an assistant Principal (in matters relating to learners), the Group Head of Estates may provide access to CCTV images for use in disciplinary cases.
- 7.8. A record of any disclosure made under this policy will be held by the Group Head of Estates itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

8. Retention of images

- 8.1. Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.
- 8.2. Where an image is required to be held in excess of the retention period referred to in 8.1, the Group Head of Estates or a nominated deputy, will be responsible for authorising such a request.
- 8.3. Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.
- 8.4. Access to retained CCTV images is restricted to the Group Head of Estates and other persons as required and as authorised by the Group Head of Estates.

9. Extraordinary provisions and special cases

- 9.1. In the event of a major incident, such as a bomb threat, explosion, serious fire, terrorism and / or serious public disorder event, the Group Head of Estates, or a nominated deputy, may authorise the passing of control of or access to the College's CCTV surveillance systems to the Police Force or other competent authority for a limited and reasonable period.
- 9.2. Requests for access to CCTV moving or still images will be made available to the Police and other law enforcement agencies; because the prevention and reduction of crime is a key purpose driver of this policy and the use of CCTV surveillance systems
 - 9.2.1. Upon requesting access to CCTV surveillance systems or retained images, the Police or other law enforcement agencies will be asked to identify their legitimate aim so that it may be recorded by the Group Head of Estates.

10. Enquiries and complaints

- 10.1. For general enquiries in relation to CCTV and this policy please email the appropriate campus team or contact us at info@sgscol.ac.uk
- 10.2. Complaints concerning the College's use of its CCTV surveillance system or the disclosure of CCTV images should be made in accordance with the College's complaints Policy and Procedure: https://www.sgscol.ac.uk/repository/documents/policies_and_procedures/corporate_other/compliments_complaints_appeals_policy_procedure_april_2021.pdf

11. Monitoring Compliance

- 11.1. All staff involved in the operation of the College's CCTV surveillance system will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
- 11.2. All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.
- 11.3. This policy is reviewed every three years or when there is a change to infrastructure.
- 11.4. CCTV Surveillance Systems, their location and use is reviewed at least every 3 years, to evaluate if it is still required or to determine if there is an alternative solution to achieve the purposes of this policy.