



CCTV POLICY

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Introduction

Telford College (the College) places the health, safety and welfare of its students, staff and visitors as an extremely high priority. CCTV is now widely used within the Further Education sector to aid the provision of a safe environment.

The College will operate CCTV within all legal and regulatory requirements, specifically:

- GDPR <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/guidance-on-video-surveillance-including-cctv/>
- Data Protection Act 2018
- The Surveillance Camera Code of Practice (Amended 2021)
<https://www.gov.uk/government/publications/update-to-surveillance-camera-code>
- Freedom of Information Act 2000
- Other relevant legislation

Scope

The purpose of CCTV is to protect the safety and property of the College community and to deter crime. Safety and security purposes include but are not necessarily limited to:

- Protection of all College users, including students, staff, visitors and contractors
- Protection of College property and equipment
- Patrol of common areas and external areas outside normal College opening hours
- Investigation of serious disciplinary procedures
- Investigation of criminal activity

In accordance with examination board requirements, a small number of cameras have been set up to capture assessment evidence for students' practical work. These fall outside of the safety and security purposes of the general CCTV system within the college.

Process/Procedure

All CCTV systems are owned and operated by the College and their contracted security guarding provider.

The following staff have specific responsibilities in relation to the CCTV system as listed below:

- **Data Protection Officer** with regards to training of staff on the viewing of CCTV.
- Contracted Security Staff:
- Day to day operation of the CCTV system following the 'The Surveillance Camera Code of Practice' overseen by the Director of Estates.
- Liaison between security officers who operate the system with regards to operation and the viewing of CCTV images to designated staff members as outlined in the 'Access to Images' paragraph of this document.
- Report any camera faults or recording issues to the IT and Estates departments as soon as they are recognised.
- **IT and Estates departments** - Overseeing maintenance, system upgrades and risk assessments of camera placements is against the ICO 'cctv-code-of-practice' and overseen by the Director of IT and Digital Innovation and the Director of Estates.

Operation of CCTV

College users are informed of the CCTV system by way of notices in entrance areas to all campus buildings and other prominent social spaces. Students are also made aware of the CCTV system during their Induction at the commencement of their course.

The CCTV system operates via the College IT network on independent servers. Unless required for evidential purposes, images are retained for up to 20 days depending on the server associated to each camera, after which they are automatically overwritten. The CCTV system is not constantly monitored but is recording 24 hours per day throughout the year.

CCTV system configuration is for internal use only by security staff that are qualified to operate CCTV.

Cameras are checked weekly by the College's contracted security team. Faults are logged via the IT and Site Services help desk, or directly with the Director of Estates. All cameras are audited monthly to check operation and functionality, with a report being provided to the Director of Estates for actioning as appropriate.

Periodic specialist servicing and maintenance is carried out by Securitywise, March Way, Shrewsbury, SY1 3JE.

Operation of CCTV in the Willow Tree

The purpose built specialist centre has three base rooms on the support base corridor fitted with CCTV which complies with safeguarding and GDPR guidance. The footage is not recorded but live streams to a monitor that is viewed by designated staff. It enables behaviour to be monitored by appropriate staff, doctors or occupational therapists in real time without disruption or confusion to students. Live CCTV streaming also enables assistance to be provided in the event of a behaviour incident where a second staff member may be of assistance to provide appropriate support.

A CCTV live stream declaration and consent form is provided to parents / carers and signed at enrolment. This signed document is kept with the student's enrolment documentation.

Operation of CCTV in The Quad (Skills Hub at Station Quarter)

Telford College will occupy the first floor of The Quad (Skills Hub at Station Quarter) from August 2024. CCTV in The Quad, will be limited to two cameras within the social space of the First Floor, where the majority of the College curriculum will be based, with other cameras in social spaces on the ground floor where students will have access to those spaces.

Footage from The Quad cameras will be retained, controlled and monitored by the Local Authority, with the College having a Service Level Agreement (SLA) to define access on request.

Access to Images

Access to CCTV images is restricted to a specific incident and time frame and the following people only:

- SLT/ELT Members – (requires supervision by the Data Protection Officer/security)
- Heads on Duty – (requires supervision by the Data Protection Officer/security)
- Contracted Security Team
- Willow Tree staff – restricted access real time viewing only

Should any staff member be included to assist for identification purposes of individual/s in a CCTV image, a '**non-disclosure**' of events must be adhered to while the Head on Duty investigates the incident.

Any requests for access to images should be agreed verbally and approved in writing to the Data Protection Officer using the correct form:

For internal use:

Appendix 1 Form LS-Q-024 (Viewing of CCTV images)

For external use:

Appendix 2 Form LS-Q-025 (Image Provision to Third Party)

The location for viewing images under these circumstances will be:

- Security Office, E001
- Willow Tree (Restricted viewing of Willow Tree cameras by designated Willow Tree staff only)

Data Protection Act 2018 & GDPR

Any request made by an individual, i.e. a member of the public or Student for CCTV footage will require a 'Subject Access Request' form, please note that any disclosure of events will be in written form in the first instance, if authorised a copy of the footage will be taken and supplied. Authorisation will be managed by the Data Protection Officer.

Any request by the police to view CCTV would require their form filled out prior to disclosing any CCTV footage which is called the '**Request to external organisation for the disclosure of personal data to the police – Under Schedule 2 Part 1 Paragraph 2 of the Data Protection Act 2018 and GDPR Article 6(1)(d) & 9(2)(c)**'.

Any disclosure of CCTV footage that includes student and or members of the public will require their consent before it is released to any other third party.

Covert CCTV Surveillance

Covert or directed surveillance can only be carried out with the permission of the Principal or under instruction from the police. Covert surveillance would be targeted at obtaining evidence only and when there are grounds for suspected criminal activity and that notifying the individual of the monitoring would prejudice its prevention or detection.

Under no circumstances would cameras be placed in areas which would reasonably be expected to be private (e.g, toilets/washrooms).

Capturing evidence of work for external assessment

The college is required to capture video evidence for the purpose of practical examination or external assessments for specific courses we offer. This recording will be carried out through a dedicated camera that will only be turned on and recording at the time of assessment, with full knowledge of the students, staff and any third party involved.

Video evidence will fall under the Colleges' assessment retention period, this is currently 2 years in order to support the need for any appeals or further requests from the examining board.

Video evidence will be stored separately from standard CCTV footage within the departments' own storage area and securely transferred to the examining board if required.

All of the above complies with requirements of the relevant Awarding Bodies, and GDPR regulations which students give consent as part of enrolment on those specific courses. The Awarding Bodies will retain names and personal identification details as a matter of course, and it is in theirs, and public interest, for them to be recognised for practical assessments as evidence.

Awarding Bodies will only retain captured footage for a defined period – usually in line with the closure of any post-awarding appeals window. The College will adhere to the same time frame for deletion.

Appendix 1 – Viewing of CCTV images

| Date of Viewing | Time | Camera | Operator |
|-----------------|------|--------|----------|
| | | | |

| Reason for viewing | |
|------------------------|-----------|
| | |
| Permission Granted by: | Position: |
| Outcome if any | |
| | |

| Name(s) of Person viewing | Signature | Organisation Details |
|---------------------------|-----------|----------------------|
| | | |
| | | |
| | | |
| | | |
| | | |
| | | |

Please be aware that signing the above you are bound to 'non-disclosure' of events whilst the Head on Duty investigates the incident.

Appendix 2 – Image Provision to Third Party

| Date of Incident | | Description | Outcome |
|-------------------|--|-------------|---------|
| Time of Incident | | | |
| Camera Identifier | | | |
| Operator | | | |

| Original to be provided, copy to be retained | | Copy to be provided, Original to be retained | |
|--|-----------------------|--|-------------------|
| Reason for Provision | | | |
| Date of Creation | Time of Creation | Operator | Camera Identifier |
| | | | |
| Crime / Incident no / Reason for Access | | | |
| Police Officer / 3 rd Party name | | | |
| Police Station / 3 rd Party Address | | | |
| Telephone number | | Date of Handover | |
| Signature | | | |
| Date of destruction / return | Method of Destruction | Operator | |
| | | | |



CCTV Live Stream declaration

We are delighted to welcome you to our Telford College community.

Ensuring the safety of all our students and staff is of paramount importance to us as well as ensuring that the College complies with safeguarding guidance.

In our purpose built, specialist centre at the Willow Tree we have a support base corridor that offers additional security and safeguarding measures to maximise student safety.

To comply with the Data Protection Act 2018 and the UK General Data Protection Regulation (May 2018), consent is required before we CCTV monitor students within the Willow Tree’s base rooms. Video footage in the three base rooms is for viewing purposes only and is not recorded onto any storage medium.

This is live streamed to a monitor that is viewed by designated staff. It enables behaviour to be monitored by appropriate staff, doctors, or Occupational Therapists in real time without any disruption or confusion to students.

Live CCTV streaming also enables assistance to be provided in the event of a behaviour incident where a second staff member may be of assistance to provide appropriate support.

CCTV Live stream parental / carer consent.

I acknowledge the use of live stream CCTV in the support base corridor of the Willow Tree and agree to the conditions of use as set out above.

Student Name..... **Student Ref:**.....

Parental / Carer Name

I do/do not* give consent (please sign)

*delete as applicable

Address

Telephone number

Date

Data Privacy Notice

Under the current Data Protection Act 2018 and UK GDPR the Information Commissioner’s Office Privacy Notices Code of Practice, privacy notices should be on all collection points where personal data is being collected from a Data Subject, especially if the data is being collected for a new purpose. Telford College is what’s known as ‘the data controller’ of the personal data you provide to us. We need to know your basic personal data to provide you with details regarding your interaction with Telford College. It will also be used by the college’s analysis services, where appropriate. We will not collect any personal data from you that we do not need to provide and oversee services to yourself. We will keep your basic personal data (name, address, contact details) for a minimum of 6 years (plus current year) after which time it will be destroyed. We have a Data Protection regime in place to oversee the effective and secure processing of your personal data. We shall not disclose the information you entrust us with to third parties except where we have a statutory or contractual duty to do so, where you have given prior approval or where an official Telford College third-party data sharing agreement exists. This information is not shared with third parties. If at any point you believe the information we process about you is incorrect, you can request to see this information and even have it corrected or deleted. Or if you wish to raise a complaint on how we have handled your personal data, you can contact our data protection officer who will investigate the matter for you, please email dpo@telfordcollege.ac.uk.