

CCTV Policy and Procedure

Version 2.1

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Responsible Person: Director – Shebul Ali

UK Graduate, 73 Greenfield Road, First Floor, London E1 1EJ
Tel: 020 3609 0260 | Email: admissions@ukgraduate.org.uk
www.UKGRADUATE.org.uk

1. INTRODUCTION

1.1 UK Graduate captures and records video images (CCTV) to support a safe and secure environment for student, staff and visitors, and to protect college property, students, staff and visitors.

2. PURPOSE OF CCTV

2.1 UK GRADUATE has installed CCTV systems to:

- Ensure staff / student safety and security.
- Assist in the deterrence, prevention, detection and prosecution of crime.
- Provide objective evidence which may be used, subject to application of the appropriate disciplinary procedure, as part of disciplinary proceedings involving staff or students to support or refute allegations of misbehavior or misconduct.
- Monitor security of campus buildings and vehicle movement problems around the campuses.

Guidance

Before installing and using CCTV on UK GRADUATE premises, the following steps should be taken:

1. Assess and document the appropriateness of, and reasons for, using CCTV.

2. Establish and document the purpose of the proposed scheme.
3. Establish and document who is responsible for day to day compliance with this policy
4. Because CCTV involves the processing of personal data, register the scheme with the data protection officer before using the system

3. COVERT RECORDING

3.1 UK GRADUATE may only undertake covert recording where:

- There is reasonable cause to suspect that an illegal or unauthorized action(s) is/ are taking place or about to take place: And where;
- Informing the individual(s) concerned that the recording is taking place would seriously prejudice the reason for making the recording;

Covert recording may only be undertaken with the written authorization of either the Director/Principal, Finance Director, or Head of Professional Services.

Guidance

Any such monitoring will only be carried out for a limited and reasonable amount of time consistent with the objectives of the monitoring, and only for specific unauthorized activity.

All such occasions will be fully documented showing who made the decision to use covert monitoring and why.

4. CAMERAS

UK GRADUATE will make every reasonable effort to position cameras so that they do not cover areas outside UK GRADUATE property and in line with the purposes set out in 2.1 above. Cameras with pan and zoom functionality may be redirected if it is suspected that activities with a safeguarding, safety or security concern, or if illegal activity is suspected to be occurring.

UK GRADUATE will clearly display signs so that staff, students and visitors are aware they are in an area covered by CCTV.

Where deemed necessary, the College will use portable devices to support the purposes set out in section 2.1. Where portable devices are deployed this shall be with the written approval of either the Director/Principal, Finance Director, or Head of Professional Services and the device or any portable media containing images (e.g. SD cards) will be stored in a secure location accessible only to appropriate individuals.

5. IMAGES

5.1 Quality

The quality of Images produced by the equipment will be reviewed on an ongoing basis and equipment replaced or upgraded so that images are effective for the purpose(s) for which they are intended.

5.2 5.2

Retention

For digital recording systems, CCTV images held on the hard drive of a PC or server will be overwritten on recycling basis once the drive is full, which is normally to be not more than 31 days. Images stored on removable media such as CDs will be destroyed, or in the case of re-writeable storage media such as SD cards will be erased once the purpose of the recording is no longer relevant.

6. ACCESS TO AND DISCLOSURE OF IMAGES TO THIRD PARTIES

6.1 Access to CCTV systems will be controlled by the Operations Manager. Disclosure of, images recorded on CCTV will be restricted and carefully controlled. This will ensure that the rights of individuals are retained, and also ensure that the images can be used as evidence if required. Images can only be disclosed in accordance with the purposes for which they were originally collected and in accordance with UK GRADUATE's Notification to the Office of the Information Commissioner, or as otherwise required by law.

6.2 Access to Images

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

Monitors displaying images from areas in which individuals would have an expectancy of privacy should only be seen by staff authorized to use the equipment.

Viewing of recorded images will take place in a restricted area to which other employees will not have access while viewing is occurring.

If media on which images are recorded are removed for viewing purposes, this will be documented.

Images retained for evidence will be securely stored.

Guidance

Document the following information when media is removed for viewing;

1. Date and time they were removed
2. The name of the person removing media
3. The name(s) of the person(s) viewing the images.
4. The name of UK GRADUATE department to which the person viewing the images belongs, or the person's organization if they are from outside UK GRADUATE.
5. The reason for viewing the images

6. The date and time the media is returned to Operations Manager for deletion.

6.3 Disclosure of images

*The Director/Principal, Finance Director, or Head of Professional Services, are the only people who can authorize disclosure of information to the police or other parties.

Disclosure to third parties will only be made in accordance with the purpose(s) for which the system is used and will be limited to:

- Police and other law enforcement agencies, where the images recorded could assist in a specific criminal enquiry and/ or the prevention of terrorism and disorder*
- Prosecution agencies
- Relevant legal representatives
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings)
- In exceptional cases, to others to assist in identification of a victim, witness or perpetrator in relation to a criminal incident.
- Members of staff involved with college disciplinary processes.

Guidance

In addition to the information required in section 6.2 above, the following should be documented;

1. If the images are being removed from the CCTV system for secure storage in another area, the location to which they are being transferred.
2. Any crime incident number, if applicable.
3. The signature (or electronic acknowledgement of receipt) of the person to whom the images have been transferred.

7. INDIVIDUALS' ACCESS RIGHTS

7.1 The Data Protection Act 1998 gives individuals the right to access personal information about themselves, including CCTV images.

All requests for access to images by individuals (when they are asking for access to images of themselves) should be made in writing to the UK GRADUATE's data protection officer.

There will be an administration charge of £10.00 for the provision of this information.

7.2 The manager responsible for the system will liaise with the data protection officer to determine whether disclosure of the images will reveal third-party information. Under the Freedom of Information Act 2000, a copy of this policy will be provided to anyone making a written request for it.

Guidance

Requests for access to CCTV images must include:

- The date and time when the images were recorded
- The location of the CCTV camera
- Further information to identify the individual, if necessary

UK GRADUATE will respond promptly and at the latest within regulatory time frames or within 30 days of receiving sufficient information to identify the images requested.

Staff responsible for CCTV systems will refer all such request to the Operations Manager. If UK GRADUATE cannot comply with the request, the reasons must be documented. The requester will be advised of these in writing, where possible.

If there is any doubt about what information must be provided to enquirers, please contact the Operations Manager.

8. RESPONSIBILITY FOR CCTV SYSTEMS

8.1 The overall responsibility for CCTV lies with the Finance Director and day to day responsibilities lie with the Operations Manager.

9. STAFF TRAINING

9.1 The Operations Manager will ensure that staff handling CCTV images or recordings receive appropriate training on the operation and administration of the CCTV systems. In addition, they will liaise with the data protection officer to ensure training is provided on the implications of the Data Protection Act 1998 with regard to those systems.

10. COMPLAINTS

10.1 Complaints and enquiries about the operation of the CCTV systems should be addressed to those having day to day responsibility, as detailed in section 8 above.

Enquiries relating to the Data Protection Act should be addressed to the Data Protection Officer.

If a complainant or enquirer is not satisfied with the response received, they should write to the Data Protection Officer.

11. MONITORING AND COMPLIANCE

11.1 Annual reviews will be undertaken by the Operations Manager and designated estates operators to ensure knowledge and compliance is kept up to date with current legislation.