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## CCTV Policy

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<b>Line Manager Responsible</b>	<b>Daniel Fairbairn</b>
<b>Policy Creator</b>	<b>Daniel Fairbairn</b>
<b>Approved by</b>	<b>SLT</b>

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## **1. POLICY STATEMENT**

BCA shall comply with The Information Commissioner's Office (ICO) code of practice issued under the Data Protection Act 1998 (DPA) which covers the use of Closed Circuit Television (CCTV), and shall comply with the General Data Protection Regulation 2016 and the Data Protection Act 2018.

The College is fully committed to operating a safe environment, it therefore has in place a closed circuit television ("CCTV") system to assist in providing a safe and secure environment for students, staff and visitors, as well as protect College property. Images recorded by CCTV are personal data which must be processed in accordance with data protection laws. The College will have due regard to the Data Protection Act 1998, 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. We are committed to complying with our legal obligations and ensuring that the legal rights of staff, students and visitors relating to their personal data, are recognised and respected.

This policy is intended to assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence.

## **2. ABOUT THIS POLICY**

BCA currently uses CCTV cameras to view and record individuals on the BCA campus. This policy outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice. This policy also explains how to make a subject access request in respect of personal data created by CCTV.

We recognise that information that we hold about individuals is subject to data protection laws. The images of individuals recorded by CCTV cameras on the BCA campus are personal data and therefore subject to the legislation. We are committed to complying with all our legal obligations and seek to comply with best practice suggestions from the Information Commissioner's Office ("ICO").

This policy covers all staff and students and may also be relevant to visiting members of the public.

A breach of this policy may, in appropriate circumstances, be treated as a disciplinary matter. Following investigation, a breach of this policy may be regarded as misconduct leading to disciplinary action, up to and including dismissal.

### **3. REASONS FOR THE USE OF CCTV**

CCTV has been introduced at various locations within BCA for the intended purpose of capturing and recording images of staff, students and visitors.

The College has installed a CCTV system to:

- improve the safety of our staff, students, residents, visitors and animals;
- monitor the welfare and behaviour of our students;
- protect College buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption
- assist with the identification, apprehension and prosecution of offenders
- assist with the identification of actions/activities that might result in disciplinary proceedings against staff and students
- assist in day-to-day management, including ensuring the health and safety of staff and others;
- support law enforcement bodies in the prevention, detection and prosecution of crime;  
facilitate in the apprehension and prosecution of criminal offenders and the punishment of civil offenders; and
- act as a deterrent against crime.

### **4. MONITORING AND ACCESS**

- CCTV monitors the exterior of the building 24 hours a day and this data is continuously recorded.
- CCTV will not be used to record sound.
- Images are monitored by authorised personnel during working hours only.
- Staff using CCTV will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.
- Rooms where this information is stored will be secured at all times.

## **4.1 HOW WE WILL OPERATE ANY CCTV**

Each camera will be numbered for identification. Appendix 1 lays out the information required for each camera including the justification and type of monitoring that will take place. These justifications will be regularly reviewed and must be considered in the event of a change in the layout of the room, such as when a teaching room becomes an office.

The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

Monitoring procedures will be restricted to staff who have justification within their job role to satisfy the above aims. These staff are Security, IT, previously nominated estates staff and previously nominated domestic services staff.

All staff with access to the CCTV surveillance must be made aware that the misuse of the system could result in a prosecution of the individual concerned for a criminal offence.

Adequate signage will be displayed to inform all users of the BCA campus that CCTV is in operation and to alert individuals that their image may be recorded. Such signs will contain details of the organisation operating the system, the purpose for using the CCTV and who to contact for further information, where these things are not obvious to those being monitored.

## **4.2 MANAGEMENT AND ACCESS**

The following roles have access to CCTV at BCA

- Head of IT Services and Digital Infrastructure, and IT Services Team
- Reception Manager
- Domestic Services Manager
- Director of Estates and Facilities [SLT], and residential members of the Estates team
- Director of Safety and support Services [SLT]
- Assistant Principal (Digital) [SLT]
- Campus Wellbeing Officers (Security - Agency contract)

## **4.3 PROTOCOL AND EXAMPLE SCENARIOS**

4.3.1 Any search of CCTV must be logged via the IT Services Helpdesk. This can be done via email to [IT-ServiceDesk@bca.ac.uk](mailto:IT-ServiceDesk@bca.ac.uk), with a subject: **CCTV Search Record** within 24 hours of the search taking place.

4.3.1.1 Please include the following information in your email:

- the purpose of any searches and whether the search was successful or not
- who carried out the search
- persons present when reviewing
- date, start and end time of the incident.
- date and time of the review
- any other relevant information

4.3.2 Any ‘term time’ search of CCTV must be approved by a Head of Department or a member of the Senior Leadership Team, the approver must be outlined in the event log (4.3.1). Subject Access Requests are handled separately.

4.3.3 Staff must adhere to the following guidelines when requesting CCTV -  
The following table outlines responsibilities for CCTV at BCA -

CCTV monitoring and requests during term time, Monday to Friday 08:30am to 16:30pm	<ul style="list-style-type: none"> <li>● Campus Wellbeing Officers (1st instance), or</li> <li>● Domestic Services Manager (2nd instance), or</li> <li>● IT Services (3rd instance)</li> </ul>
16:30pm to 08:30am, evenings and overnight requests from emergency services (out of hours requests)	<ul style="list-style-type: none"> <li>● SLT, assess the urgency of the request and provide access if available. (Step 1)</li> <li>● Domestic Services Manager, or Residential members of the Estates Team provide access to emergency services (Step 2)</li> <li>● Head of IT Services to support with access and download of information as required.</li> </ul>
Monday to Friday 08:30am to 16:30pm, outside of term time	<ul style="list-style-type: none"> <li>● Reception Manager (1st instance), or</li> <li>● Domestic Services Manager (2nd instance), or</li> <li>● IT Services (3rd instance)</li> </ul>

4.3.4 The following table offers examples to staff for processing CCTV requests -

<b>Example Scenario 1</b>	HoD or SLT can authorise Campus
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<p>An incident involving students fighting during the college day.</p>	<p>Wellbeing officers to search CCTV.</p> <p>CCTV can be used as evidence to inform disciplinary procedures, however CCTV cannot be revealed to students/parents without approved SAR.</p>
<p><b>Example Scenario 2</b> A parent sends a Subject Access Request (SAR) to the Head of Department for their son/daughter’s curriculum area</p>	<p>HoD or SLT to seek release approval from DPO (Principal). Approved release to be overseen by Assistant Principal (Digital) and/or Head of IT Services.</p> <p>If applicable still image provided with identifiable assets blurred. (see 4.6)</p>
<p><b>Example Scenario 3</b> Police request to view CCTV for an out of hours incident, such as an incident involving vehicles on BCA property earlier in the week (non-emergency).</p>	<p>Non-emergency out of hours requests advised to hold until 08:30am.</p>
<p><b>Example Scenario 4</b> Police request to view CCTV for an out of hours incident, such as a missing child (emergency).</p>	<p>Emergency request to be dealt with as priority via any of the following channels -</p> <ul style="list-style-type: none"> <li>● Domestic Services Manager, or</li> <li>● Head of IT Services, or</li> <li>● SLT, or</li> <li>● Residential members of the Estates Team</li> </ul>

#### 4.4 VIEWING AND DOWNLOAD PROCEDURE

Should a download be required as evidence, an electronic copy may only be made by the IT Department on Head of Department request and after SLT approval.

Where this is to be released to the Police this will only be released to the Police on receipt of a completed Data Release Form and sight of their warrant card/proof of identity.

#### 4.5 USE OF DATA GATHERED BY CCTV

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

[Given the large amount of data generated by surveillance systems, we may store video footage using a cloud computing system. We will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.]

We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

## **4.6 RETENTION AND ERASURE OF DATA GATHERED BY CCTV**

Images recorded will be stored for 21 days. After 21 days they will be automatically deleted unless the Senior Leadership Team at BCA have decided that there is sufficient justification for delaying the deletion due to ongoing investigations. The monitoring of this will be strictly limited with password access only. Information will only be shared with third parties pre-approved by the DPO, with the exception of Thames Valley Police or any other relevant police force as necessary.

We will maintain a log of when data is deleted.

At the end of the relevant retention period, all images stored in whatever format will be erased permanently and securely. Any physical matter will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.

## **4.7 SUBJECT ACCESS REQUESTS**

Data Subjects may make a request for disclosure of their personal information and this may include CCTV images. A data subject access request is subject to the statutory conditions from time to time in place and should be made in writing using the form provided in Appendix 2.

In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.



We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.

To view an image the first section of Appendix 2 must be completed by the applicant and taken to the following administrators:

- Student applications to: The Welfare Manager or the other designated member of that team, to seek release approval from DPO (Principal). Release to be overseen by Assistant Principal (Digital) and/or Head of IT Services.
- Staff applications to: The HR Department or SLT. SLT to seek release approval from DPO (Principal). Release to be overseen by Assistant Principal (Digital) and/or Head of IT Services.

To submit a request to obtain a copy of an image, the applicant can submit the completed form to the above relevant address. This form will be submitted to the Executive Team to consider as to whether the image will be given based on individual criteria. The welfare and safeguarding of all our students will be considered in this decision.

All requests including those denied must be recorded in the Executive Team, CCTV folder in the public drive and should set a precedent for future applications to ensure fairness. A copy of the image will also be stored here. As per 4.3.1 any search of CCTV must be logged via the IT Services Helpdesk. This can be done via email within 24 hours of the search taking place.

## **5. COMPLAINTS AND FURTHER INFORMATION**

If any member of staff has questions about this policy or any concerns about our use of CCTV, then they should speak to their manager in the first instance.

Where this is not appropriate or matters cannot be resolved informally, employees should use our formal grievance procedure.

Any data subject who is concerned about BCA's use of CCTV should contact the appointed Data Protection Officer (DPO), currently the interim Principal Anne Entwistle, who is available at:

Address: Berkshire College of Agriculture (BCA) Hall Place, Burchetts Green  
Maidenhead SL6 6QR  
Email: AEntwistle@bca.ac.uk

If you believe that BCA has not complied with your data protection rights, you can complain to the Information Commissioner Office (ICO) - <https://ico.org.uk/>

This policy was last updated November 2021, and will be reviewed and updated regularly.

## **APPENDIX 1**

### Camera Justifications

Each camera will be positioned to record for:

Observation monitoring (O)

Recognition of the subject (R)

Identification purposes (I)

Camera number	location	Justification
1	Sports Centre	O
2	Lovelace	OR

3	E Block	ORI
5	Nelson House	O
6	Nelson House	O
7	Workshop	RI
10	PTZ	OR
12	Mansion	O
13	Mansion	O
14	Mansion	O
16	JY1	OR
18	Learning Centre	ORI
19	The Zone	ORI
20	Learning Centre	ORI
21	GTB	ORI
22	Learning Centre	ORI
23	Learning Centre	ORI
24	Learning Centre	ORI
25	TFD	OR
26	TFD	OR
27	Workshop	RI
28	Workshop	RI
31	GTB	ORI
32	GTB	ORI
33	GTB	ORI
34	Animal Unit	RI
35	Stables	ORI
38	Conference Hall	RI

39	Conference Hall	RI
40	Skills Centre	ORI
41	Skills Centre	ORI

42	Skills Centre	ORI
43	Skills Centre	ORI
44	Workshop	RI
48	Conference Hall	RI
49	The Zone	ORI
50	The Zone	ORI
52	Learning Centre	ORI
54	Learning Centre	ORI
55	Learning Centre	ORI
56	Learning Centre	ORI
57	Learning Centre Upper	ORI
58	Learning Centre Upper	ORI
59	Learning Centre Upper	ORI
60	Learning Centre Upper	ORI
61	Science	OR
62	Science	OR
63	inside AU	ORI
64	GTB	ORI
65	The Shop	ORI
66	EC	OR
67	EC	OR
69	Skills Centre	OR

70	North Cafe	ORI
71	North cafe	ORI
72	EC	OR
73	GT Smoking Area	ORI
74	HSC Cafe	ORI
75	JY > Zebra Crossing	ORI
76	JY > Bicycle rack	ORI
77	CC > Loading bay	ORI
78	CC > Motorbike parking	ORI
79	GT Students' Parking	ORI

## APPENDIX 2

### Application for CCTV Data Access (Subject Access Request)

Name and Address of applicant:	
Please state your reason for requesting the image:	
Date image was taken:	

Time image was taken:	
Full description of applicant if not already known to BCA	
Will you be satisfied with viewing the image only?	Yes / No
Authorised Systems Operator:	
Access granted:	Yes / No
Reason for not granting:	
Camera number:	
Date image issued:	Name:  Signature: