



Closed Circuit Television Policy

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Introduction

'Cheltenham College' refers to Cheltenham College Senior School *and* Cheltenham College Preparatory School (including Cheltenham College Pre-Prep and Nursery School)

'College' refers to Cheltenham College Senior School

'Cheltenham Prep' refers to Cheltenham College Preparatory School

'Nursery and Pre-Prep' refers to Cheltenham College Nursery School and Pre-Prep

This CCTV Policy is available, to staff and pupils of the school. The accompanying CCTV Privacy Impact Assessment is available on Cheltenham College website.

1. Purpose of the CCTV Policy

The purpose of this policy is to formalise the use of Closed-Circuit Television and its associated technology in the monitoring of both the internal and external areas of Cheltenham College premises.

CCTV is installed in Cheltenham College premises to enhance the safety and security of pupils, staff and visitors, as well as to secure our buildings, heritage and assets. Cheltenham College CCTV operates 24-hours a day throughout the year.

CCTV surveillance at Cheltenham College is intended for the purposes of:

- ☐ Enhancing the health and safety of pupils, staff, and visitors
- ☐ Supporting safeguarding of pupils and visiting pupils
- ☐ Preventing bullying;
- ☐ Reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- ☐ Protecting Cheltenham College, its buildings, assets, finances, and reputation
- ☐ Supporting the Police to deter and detect crime
- ☐ Assisting in identifying, apprehending and prosecuting offenders
- ☐ Ensuring that the school rules are respected so that the school can be properly managed.
- ☐ Monitoring safety on crossing points on roads surrounding Cheltenham College

2. Scope

This policy relates to the location, use, monitoring, recording of cameras and subsequent use of CCTV recorded material.

3. General Principles

Cheltenham College has statutory responsibilities to protect its people, heritage and assets, as well as providing reassurance to employees, students and visitors. Cheltenham College owes a duty of care, under the provisions of Health, Safety and Welfare at Work etc Act 1974, and uses CCTV as an added layer of safety and security. This enhances the quality of life of the school community, by integrating good practice in the use of CCTV surveillance of its premises and surrounding areas.

Sitting at the core of Cheltenham College's approach to CCTV, are the key Cheltenham College policies that underpin the principles of pupil safety and professional conduct of staff. Therefore, CCTV monitoring of public areas for security purposes is conducted in a manner consistent with these underpinning policies;

- ☐ Key - Behaviour Policy
- ☐ Key - Child Protection and Safeguarding
- ☐ Key - Keeping Children Safe in Education
- ☐ Key - Staff Code of Conduct
- ☐ Key - Whistleblowing Policy
- ☐ Data Protection Policy
- ☐ Privacy Notices for Pupils, Staff, Parents, Guardians and Cheltonian Society Members
- ☐ Equality and Diversity Policy
- ☐ Dignity at Work Policy
- ☐ Health and Safety Policy
- ☐ Fire Safety Policy

CCTV use is conducted in a professional and ethical manner and use of CCTV for purposes, other than stated in this policy, are prohibited. This is underpinned by Cheltenham College CCTV Privacy Impact Assessment.

The College Privacy Notice for Pupils, Parents, Guardians and Cheltonian Society members can be found on the following link;

<https://www.cheltenhamcollege.org/wp-content/uploads/2021/11/Privacy-Notice-for-Pupils-Parents-Guardians-and-Cheltonian-Society-Members-CC-2.pdf>

Information obtained through the CCTV system may only be released to a third party when authorised by the Bursar. Any requests for CCTV recordings/images from the Police will be recorded and legal advice may be sought if such a request is made. (See "Access" below). A Police Officer may be required to obtain a warrant for the material and accordingly any such request made by the Police should be in writing.

CCTV monitoring within Cheltenham College premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information, obtained in breach of this policy, may not be used in a disciplinary proceeding against an employee pupil or visitor of Cheltenham College.

All CCTV systems and associated equipment are compliant with this policy. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the Data Protection Acts 2018 and the General Data Protection Regulation.

When CCTV cameras are introduced in new locations, an application will be made for approval by the Bursar and staff will be notified. Where systems are already in operation, their operation is reviewed annually.

4. Justification for the use of CCTV

The General Data Protection Regulation (principle c) requires that data is "adequate, relevant and limited to what is necessary" for the purpose for which it is processed. This means that Cheltenham College needs to justify the capture and use of personal data by means of a CCTV system. The use of CCTV to monitor common walkways, buildings, interior areas and the perimeter of Cheltenham College, for safety and security purposes, has been deemed to be justified by Cheltenham College. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation, it also supports safeguarding principles.

CCTV systems will not be used to monitor normal teacher/pupil classroom activity in Cheltenham College.

In other areas of the school where CCTV has been installed, e.g. reception areas, library, common rooms and restaurants, it has been demonstrated that there is a risk to security, discipline and/or health & safety and that the installation of CCTV is proportionate in addressing such issues.

5. Location of Cameras

The location of cameras is a key consideration for Cheltenham College. CCTV monitoring, where individuals would have a reasonable expectation of privacy, is not permitted by this policy. Cheltenham College has endeavoured to select locations for the installation of CCTV cameras which are least intrusive and protect the privacy of individuals. Cameras placed to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property. Locations of cameras are contained in CCTV Privacy Impact Assessment.

CCTV Video Monitoring and Recording of Public Areas include the following:

- ☐ **Protection of school buildings and property:** Building perimeters, entrances and exits, receptions, lobbies, corridors, stairwells, and storage areas
- ☐ **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
- ☐ **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
- ☐ **Video Patrol of Public Areas:** Quad, front driveway, parking areas, minibus parking area, main entrance/exit gates and driveways
- ☐ **Criminal Investigations (carried out by the Police):** Robbery, burglary and theft surveillance
- ☐ **Internal areas of Pupil and Staff Assembly:** Assembly halls, sports facilities, library, Upper College Common Room, restaurants, serveries, and coffee shop
- ☐ **Monitoring of pupil safety on traffic controlled pedestrian crossings:** Thirlestaine Road, Sandford Road and College Lawn Junction

6. Covert Surveillance

Cheltenham College does not engage in covert surveillance.

Where Police request to carry out covert surveillance on school premises, this will be requested in writing and will require approval by the Bursar, who may seek legal advice.

7. Notification and Signage

Adequate signage is placed at locations where CCTV cameras are sited.



Appropriate locations for signage include:

- ☐ At entrances to premises i.e. external doors, school gates
- ☐ Reception areas
- ☐ Pedestrian Crossings

8. Storage and Retention

The General Data Protection Regulation (Principle e) states that data shall be kept "for no longer than is necessary for" the purposes for which it was obtained.

Ordinarily CCTV images are stored for 30 days before being written over. However, where images identify an issue - for example a crime or health and safety matter, then those particular images/recordings will be retained for an investigation/prosecution of that issue.

Digital recordings are stored in a secure environment with a log of access to stored data is kept. Access is restricted to authorised personnel.

Data held on NVR (Network Video Recorders) hard drive is fully encrypted and data is protected by admin password which include access by IP address.

9. Access

Access and maintenance of the CCTV System is the responsibility of Cheltenham College. The administration of the CCTV System is delegated to the Head of Security and Portering. When CCTV recordings are being viewed, access is limited to authorised individuals on a need-to-know basis.

Access to the CCTV system and stored images is restricted to authorised SIA CCTV Licensed personnel only. In relevant circumstances, CCTV footage may be accessed for:

- ☐ Following a request by the Police when a crime or suspected crime has taken place
- ☐ The HSE or statutory body charged with child safeguarding
- ☐ The Head in establishing facts in cases of unacceptable pupil behaviour, in which case, the parents/guardians will be informed
- ☐ Heads of Department, Housemasters/mistresses and functional leads to support investigations, trend analysis and support safety and safeguarding
- ☐ Data subjects (or their legal representatives), subject to an access request
- ☐ Individuals (or their legal representatives) subject to a court order

- ☐ Cheltenham College insurers

Requests by the Police: Information obtained through CCTV monitoring will only be released when authorised by the Bursar, in cases, this may require consultation with the President of Council and may take legal advice. If the Police request CCTV images for a specific investigation, any such request should be made in writing or by a warrant.

Access requests: On written request, any person whose image has been recorded may view a copy of the information recorded which relates to them, provided that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an application in writing to the Bursar. Cheltenham College (with the guidance of the Data Protection Lead where necessary) will respond to such a request within one month.

A person should provide all the necessary information to assist Cheltenham College in locating the CCTV recorded data, including the date, time, and location of the recording. If the image does not clearly identify an individual, that image may not be personal data and may not be handed over by Cheltenham College.

In giving a person a copy of their data, Cheltenham College may provide relevant images. However, Cheltenham College may not be able to give copies of all images if it is not possible to obscure images (and therefore the right to privacy) of other individuals.

10. Responsibilities;

Cheltenham College will:

- ☐ Ensure that the use of CCTV systems is implemented in accordance with this policy
- ☐ Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Cheltenham College
- ☐ Ensure that the CCTV monitoring system is evaluated for compliance with this policy
- ☐ Ensure that the CCTV monitoring at Cheltenham College is consistent with the standards and protections contained in this policy
- ☐ Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- ☐ Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system
- ☐ Consider both pupils and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- ☐ Ensure that all areas being monitored are not in breach of an expectation of the privacy of individuals within Cheltenham College
- ☐ Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and public areas and comply with the principle of 'a reasonable expectation to privacy'
- ☐ Ensure that storage is secure with access by authorised personnel only SIA CCTV Licensed
- ☐ Ensure that images recorded on disc or other storage are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other legitimate use as approved by the Bursar

- ☐ Seek to ensure, where reasonably practicable, that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to ensure that there is no unwarranted invasion of privacy
- ☐ Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics

The Data Protection Lead will:

- ☐ Advise in the use of CCTV systems to seek to ensure they are implemented in compliance with Data Protection Legislation

11. Implementation and Review

The policy and its privacy impact statement will be reviewed annually. On-going review and evaluation should consider any changing information or guidelines, for example, from the Information Commissioner's Office, Police, Department of Education, Independent Schools Inspectorate, national guidelines and feedback from parents/guardians, pupils, staff and others.

APPENDIX

DEFINITIONS

Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;

- **Authorised personnel** – Members of Cheltenham College staff who hold a Security Industry Authority licence.
- **CCTV** – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.
- **Data Protection Legislation** – The Data Protection Acts 2018 and the General Data Protection Regulation confer rights on individuals as well as responsibilities on those persons handling, processing, managing, and controlling personal data. All Cheltenham College staff must comply with the provisions of the Data Protection Legislation when collecting and storing personal information. This applies to personal information relating both to employees and individuals who interact with Cheltenham College
- **Data** - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).
- **Personal Data** – Data relating to a living individual who is or can be identified either from the data or from the data in conjunction with other information that is in, or is likely to come into, the possession of the data controller.
- **Access Request** – this is where a person makes a request to the organisation for the disclosure of their personal data under Section 3 and/or section 4 of the Data Protection Acts. Access Requests are also covered under the General Data Protection Regulation and forthcoming UK Data Protection Bill.
- **Data Processing** - performing any operation or set of operations on data, including:
 - Obtaining, recording, or keeping the data,
 - Collecting, organising, storing, altering, or adapting the data,
 - Retrieving, consulting, or using the data,
 - Disclosing the data by transmitting, disseminating, or otherwise making it available,
 - Aligning, combining, blocking, erasing, or destroying the data.
- **Data Subject** - an individual who is the subject of personal data.
- **Data Controller** - a person who (either alone or with others) controls the contents and use of personal data.
- **Data Processor** - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee to which the data controller out-sources work. Data Protection Legislation places responsibilities on such entities in relation to their processing of the data.