

## CCTV Policy

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<b>Policy Lead:</b>	Head of Information Systems / Network Manager
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### Vision

Loreto College is centred in God, rooted in Christ and animated by the spirit of Mary Ward, the founder of the Institute of the Blessed Virgin Mary. Our vision is that it will be an educational community where each person has the experience of being loved and valued as a sacred individual created by a loving God; a community where students enjoy an enriching and liberating education that helps them grow into the fullness of life and empowers them to be men and women of courage who are alive to the needs of humanity and committed to making a better world.

### Introduction

The College aims to be an educational community which gives expression to the core values of Mary Ward - freedom, justice, sincerity, truth, joy, excellence and internationality. Loreto College has the highest expectations of personal, academic and professional excellence. This document sets out the steps taken by the college to use CCTV to enhance the safety and security of the college staff, students, visitors and estate. In doing so, the college will be mindful of its core values and of its duty of care to all its staff, students and visitors: it will use CCTV in accordance with this policy, the GDPR Policy and its other legal obligations.

### Scope of Policy

The purpose of this policy is to regulate the management and use of CCTV at Loreto College. The policy has been written following the guidelines given in 'In the Picture: A data protection code of practice for surveillance cameras and personal information' published by the Information Commissioner's Office (ICO) on 21<sup>st</sup> May 2015, version 1.1, and the 'Surveillance Camera Code of Practice' published by the Home Office in June 2013.

This policy outlines how Loreto College complies with the 12 guiding principles given in the 'Surveillance Camera Code of Practice'.

#### 1. Aim of the CCTV System

*Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need*

The College uses CCTV to help maintain an environment for students, staff and visitors, which supports their safety and welfare; to assist in the prevention of disorder or crime against persons and College property or

assets and to assist in the identification and prosecution of persons having committed an offence.

## 2. **Individuals Privacy**

*The user of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified*

CCTV cameras are not used in any area of the College where there is a particularly high expectation of privacy, such as toilets or changing rooms.

The cameras do not focus on private homes, gardens or other areas of private property adjacent to the College.

The system does not make audio recordings.

## 3. **Information and Complaints**

*There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints*

All areas of the College where cameras are in use are identified with appropriate CCTV signage.

Complaints regarding the use of the CCTV system should be made by following the College's complaints procedure.

The College will share information about the nature of complaints with the Surveillance Camera Commissioner to assist with the review of the operation of this policy.

## 4. **Responsibility and Accountability**

*There must be clear responsibility and accountability for all surveillance camera system activities, including images and information collected, held and used*

Governing Body: The Governing Body has the responsibility to ensure that there is a clear written policy statement that outlines how the College complies with CCTV regulations and delegate the management of the system to the Principal.

Principal: The Principal is responsible for the development and operation of the system via the delegation of roles, authority and duties for the use, management and maintenance of the CCTV system to the relevant staff and ensures that they are informed of these responsibilities and trained to carry them out. The Principal **will provide annual reports to the Governing Body and** investigate any reported breaches of the CCTV Policy by staff.

Deputy Principal (Students): The Deputy Principal (Students) is responsible for overseeing the work of the Heads of Hall in connection with the safety and welfare of students and to assist in the prevention of disorder or crime against persons and College property or assets. In the absence of the Deputy Principal (Students), this responsibility is delegated to the Assistant Principals responsible for Lower Sixth and Upper Sixth students.

Network Manager: is responsible for the management of the CCTV system, staying up to date with relevant CCTV legislation, staff training arrangements, audit of its correct use in line with this policy and provision of reports to the SLT. They are also responsible for the maintenance and repair of the CCTV systems, negotiating the terms of contracts with the CCTV equipment supplier and other related security companies.

IT Technicians: are responsible for the day to day use of the CCTV system in line with this policy, recording details of access to the system and attending training to ensure they are certified in the use of the CCTV system.

**Security Staff:** are responsible for the use of the CCTV system for night-time monitoring in line with this policy.

**5. Policy, Procedure and Communication**

*Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them*

The CCTV system is operated in line with this policy, which is shared with all staff and students via myLoreto.

A separate CCTV Hand Book outlines the specific procedures to be followed by the relevant staff.

**6. Storage of Data**

*No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged*

The system records up to 30 days of footage, after which the footage is automatically deleted.

The College has the right to download images where there is suspicion that a crime has been committed. On occasion it may be necessary to retain downloaded images or footage for a longer period, for example when a law enforcement body is investigating a crime, to give them the opportunity to view the images as part of an active investigation.

Any downloaded images or footage will be destroyed once they are no longer required for an active investigation.

**7. Access to Images and Information**

*Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.*

The Principal has authorised the Head of Information Systems, Network Manager and IT Technicians to access CCTV footage to enable them to carry out their duties. The Principal, SLT, The Head Of Information Systems, Director of College Services, the Facilities Manager and Assistant Principals (Head of Student Services) can authorise other relevant members of staff or third parties to view footage on an as needs basis to assist in investigating incidents. If the incident relates to a member of staff or a visitor, the footage can only be viewed with the express permission of the Principal. These requests must be made via email to the Principal directly by the member of staff requesting it, giving the date, time and reason for access.

Requests for the disclosure of images and information to law enforcement agencies have to be made in writing and be approved by the Principal or a member of SLT

CCTV footage will not be released to the media, or used for commercial purposes, or for the purpose of entertainment.

**8. Competency Standards**

*Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.*

It is not required for IT staff to hold specific certificates as they are not constantly monitoring the CCTV system and only use it for investigative purposes.

Night-time security staff responsible for night-time CCTV monitoring must hold a current SIA CCTV Licence.

#### 9. Security

*Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use*

Logs are kept of access to the system by the Network Manager/IT Technicians; giving the date, time and reason for access.

Footage downloaded for evidence is recorded and controlled via an approved evidence system.

Logs and records relating to the CCTV system are kept in a secure network location.

The CCTV system is regularly maintained.

#### 10. Review and Audit

*There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published*

The CCTV policy and procedures are reviewed every two years to ensure it remains necessary, proportionate and effective in meeting its purpose.

The camera locations are reviewed as part of the CCTV maintenance schedule and alternative interventions are considered to determine if they provide less risk to individual privacy.

#### 11. Support of Public Safety and Law Enforcement

*When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value*

The main purpose of the College's CCTV system is to help maintain an environment for students, staff and visitors, which supports their safety and welfare, however there may be instances where footage from the system can assist in crime prevention, detection and investigation.

To ensure the forensic integrity of recorded images and information evidence will be handled in line with the Police & Criminal Evidence Act (1984).

#### 12. Reference Database

*Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date*

The College does not use the CCTV footage to record data that is compared against a reference database, excepting the use of the ANPR (Automatic Number Plate Recognition) System to control car park access.

#### Related Policies

- General Data Protection Regulation Policy

