SPARSHOLT COLLEGE GROUP

SPARSHOLT COLLEGE HAMPSHIRE

UNIVERSITY CENTRE SPARSHOLT

ANDOVER COLLEGE

CCTV Policy

Excellence • Passion • Integrity

Our Mission

Raising Aspirations, Unlocking Potential, Advancing Futures

Our Values

Excellence, Passion, Team Work, Integrity, Innovation, Sustainability, Valuing Others and Supportiveness

Sparsholt College Hampshire, incorporating Andover College

The Sparsholt College Group (the College Group) includes Sparsholt College, Andover College, University Centre Sparsholt, Sparsholt College Services, Westley Enterprises and Andover Town Football Club. College Group policies apply to each part of the group unless specified otherwise.

The CCTV Policy was approved by the SLT in April 2023.

Originator:	Director of Estates
Located:	College websites
	College Group intranet
Due for review:	February for April 2026

CCTV Policy

Contents

CCTV POLICY AND LINKED PROCEDURES

1. CCTV POLICY STATEMENT

Sparsholt College Group (the College) has installed CCTV systems across its campuses which include some locations used by members of the public. The systems are installed for the purposes of public safety and crime prevention/detection. This is supported by Section 163 of the Criminal Justice and Public Order Act 1994 for Local Authorities and the Crime and Disorder Act 1998 for the Police.

The College considers the CCTV scheme will achieve the following objectives:

- To assist in the reduction of crime, anti-social behaviour, the fear of crime and increase the confidence of the public in the area
- Facilitate the identification of offenders and provide evidence if any disciplinary proceedings are instituted against an individual learner or member of staff
- Assist in the prevention and detection of crime and disorder committed in public areas
- Deal with any serious public safety concerns
- To monitor the security of the College's business premises
- To ensure that health and safety rules and College policies and procedures are being complied with
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to assist in providing relevant evidence

The system will only be used for these objectives, and for no other purposes. The CCTV scheme is intended to contribute to the provision of a safe and comfortable environment in the College for the benefit of all those who work, study, live on or visit the campuses covered by CCTV.

This policy applies to CCTV and other systems which capture images of identifiable individuals operated for the purposes of promoting security. Sparsholt College Group operates a CCTV surveillance system throughout the College estate, with images being recorded centrally. The system is owned and managed by the College and operated by the College's Estates Department.

2. BACKGROUND

Andover campus: a campus of a 16+ tertiary college in the heart of the cultural quarter of the town of Andover. The college also has 14 to 16 years olds school pupils attending one day per week. Our security arrangements include CCTV of external areas.

Sparsholt: a residential campus for students of 16+ and with a mixed age of residential students including those up to age 25, the campus is rural with a marked public footpath running through. The college also has 14 to 16 years olds school pupils attending one day per week. Our security arrangements include CCTV of external areas.

3. COMPLIANCE

Images obtained from the system which include recognisable individuals constitute personal data and are covered by the United Kingdom General Data Protection Regulation (UK GDPR) and any other current Data Protection Act 2018. This Policy should therefore be read in conjunction with the College's Data Protection Policy. Sparsholt College Group is the registered data controller under the terms of the Act. The Data Protection Officer for the College is responsible for ensuring compliance with the Act. This policy has been drawn up in accordance with the advisory guidance contained within the Information Commissioner's CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.

Video surveillance (including guidance for organisations using CCTV) | ICO

4. DESIGN AND OPERATION OF THE SYSTEM

The system comprises static cameras as well as cameras that are programmed to change position at regular intervals or can be moved by the operator to focus on a particular area of concern to maintain the safety of staff, students and visitors. CCTV may be monitored live by designated staff employed by Sparsholt College Group. The system will also be operated in accordance with the 12 Guiding Principles set out in the Draft Surveillance Camera Codes of Practice 2021.

Unless an immediate response to events is required staff will not direct cameras at an individual, their property or a specific group of individuals. The exception to this would be in cases where written authorisation has been obtained from the Principal for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

Warning signs have been placed in all external areas where CCTV is operational. In addition further signs have been placed internally within the college.

All sign locations and content are compliant with the Information Commissioners Code of Practice. Draft updated surveillance camera code of practice (accessible version) - GOV.UK (www.gov.uk)

5. INFORMATION RETENTION

Images and information shall not be stored longer than is required for the stated purpose. Images will be deleted once their purpose has been discharged. Information used as a reference database for matching purposes will be accurate and kept up to date. Images captured by CCTV will not be kept for longer than

six weeks and will be deleted after such time. However, on occasions there may be a need to keep images for longer, for example where an investigation has become necessary.

6. CCTV ACCESS AND CONTROL

No unauthorised access to the CCTV viewing equipment will be permitted at any time. Access will be strictly limited to:

- Estates Director
- Facilities Supervisors Sparsholt and Andover
- Residential Support Manager
- Residential Support Officers – Wardens
- Site Duty Officers
- Data Protection Officer
- Senior Post Holders

All staff who have access to view CCTV are made aware of the sensitivity of handling CCTV images and recordings. The Director of Estates will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.

We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include staff authorised by the Principal, Deputy Principal and Director of Finance involved with disciplinary or grievance matters and investigations. Recorded images will only be viewed in designated, secure offices.

7. DISCLOSURE OF CCTV IMAGES

Any individual who believes that they have been filmed by the system can request a copy of the recording, subject to any restrictions covered by the Data Subject Request, in accordance with data protection legislation. Data subjects also have the right to request that inaccurate data be corrected or erased.

Access or disclosure requests will only be authorised by a Data Protection Officer and must be received within 14 days of the footage being taken. 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.

Requests for access to, or disclosure of, images recorded on the College CCTV systems from third parties, will only be granted if the requestor falls within the following categories:

1. Data subjects (persons whose images have been confirmed as recorded by the CCTV systems).
2. Footage of other personal data (images of others) are not disclosed.

3. Law enforcement agencies.
4. An authorised College member who has responsibility for student discipline - in the course of a student disciplinary investigation.
5. An authorised member of College staff in the investigation of a Health and Safety at Work Act incident.
6. An authorised member of staff in the investigation of crime.
7. An authorised member of staff in the investigation of process
8. Relevant legal representatives of data subjects.

Access requests should be addressed to the Data Protection Officer of the College using the following email: data.protection@sparsholt.ac.uk

8. ACCESS TO IMAGES BY A LAW ENFORCEMENT AGENCY

In serious cases of crime or public safety, relevant law enforcement agencies may view CCTV images if requested in person and subject to authorisation by one of the Data Protection Officer or the Director of Estates. Law enforcement agencies may also view or request copies of CCTV images in pursuance of their duties.

9. ACCESS TO IMAGES BY SUBJECT

CCTV digital images, if they show a recognisable person, or any other identifying details (e.g. Registration plates), are personal data and are covered by the UK GDPR. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Act. They do not have the right of instant access.

A person whose image has been recorded and retained and who wishes access to the data must apply in writing to and received by the Data Protection Officer within 14 days of the footage being taken, in accordance with our Data Protection Policy, available on our intranet and website. All applications must be made by the Data subject themselves, or their legal representative. Requests will be processed promptly.

Freedom of Information request will be responded to within 20 working days. The UK GDPR gives the Data Protection Officer the right to refuse a request for a copy of the data where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, or the images have been erased. If a data subject access request is refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

The Freedom of Information Act 2000 gives the Data Protection Officer exemptions under Section 40 and 38 of that act which could prevent disclosure of CCTV images. If a refusal is made under these exemptions, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

College senior post holders and the Designated Safeguarding Officer may also refuse the right to access subject images if they believe that releasing the images

could jeopardise the safety, security or privacy of any other member of our community.

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.

10. COVERT RECORDING

Covert cameras may be used only in very limited circumstances. This requires the written authorisation of the Principal. Covert surveillance may be carried out in cases of suspected specific criminal and/or fraudulent activity only where the objective of making the recording would be seriously prejudiced should the individual(s) concerned be informed of such surveillance.

Any authorisation to use covert surveillance must include a justification of the need to use such methods to obtain evidence of suspected criminal and/or fraudulent activity in a specific case; an assessment of alternative methods of obtaining such evidence and a statement of how long the covert monitoring should take place. The authorisation must be reviewed every 28 days and consider whether that should continue or be closed. Any decision to use covert surveillance for any reason must be fully documented and records of such decision retained securely.

11. BODY WORN VIDEO CAMERAS

Body worn video cameras (BWV) are CCTV cameras attached to the uniforms of security staff. These cameras record both audio and visual footage. BWV can only be used with the approval of the Principal and can only be worn to satisfy the purposes set out in section 1 of this policy.

College staff do not routinely wear body worn video cameras. However, should there be a need for the use of BWV it shall be managed by the College's Director of Estates. The Facilities Supervisors shall be responsible for the use and for training of staff in its use. All staff who may use BWV will have full training in their use. No staff will be permitted to use BWV until they have read and agreed to this Policy.

All incidents which involve the use of body worn cameras shall be logged, documenting the date, time, reason for use, name of authoriser and name of the officer wearing the BWV. The member of staff wearing BWV is always responsible for its use.

Before recording commences, staff wearing BWV should alert those present that the recording will be taking place stating the following:

- that recording is taking place;
- that this includes audio recording;
- their own name and that of any colleagues;
- the date;
- the time;
- the location; and

- the nature of the incident.

If the recording has started prior to the arrival of the member of staff at the scene, they should state this upon arrival.

Where this is not operationally possible, this information should be provided as soon as it is practicable to do so.

The cameras shall be aimed at those involved in the incident and not at third parties who are not involved. Officers should do their best to ensure that those not involved in an incident are not recorded: this may include standing in a position to block them from being filmed or asking them to move.

BWVs should never be used covertly or concealed.

Footage on the camera will be retained for 30 days unless required for the purposes of an investigation.

12. LIVE STREAMING AND RECORDING OF TEACHING SESSIONS

The live streaming and/or recording of teaching sessions may take place in designated classrooms where teaching is being delivered remotely for some students. Where this is the case, signage should be in place notifying students of this and allowing them the option to notify the tutor should they not wish their image to be captured. It may be appropriate to allocate seating in a position where the student's image will not be captured by the live streaming/recording.

Where a student chooses to participate in the teaching session, they may then be identifiable, and it must be made clear that the legal basis for the use of personal data in live streaming/recording is not consent, and therefore there can be no request that they not be identified as they have chosen to participate.

13. COMPLAINTS

Any complaints about the use of CCTV at the College will be managed in line with the College's Guidelines for the Management of Complaints (and other Feedback), which can be viewed on the College's website.

Linked policies

Security Policy
Data Protection Policy
IT Policy

Linked procedures

Specific Operational Security Guidelines and Procedures

Crisis/Disaster Management Plan

Other External

Gov UK

Draft updated surveillance camera code of practice (accessible version) - GOV.UK (www.gov.uk)

ICO

Video surveillance (including guidance for organisations using CCTV) | ICO

DFE https://www.gov.uk/government/publications/school-and-college-security/school-and-college-security