



CCTV POLICY

Date of Policy	August 2021
Next Review Date	August 2022
Lead for Review	Principal, IT Director, Data Protection Officer

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1. Introduction

1.1 CATS Global Schools (CGS) has in place a CCTV surveillance system “the CCTV system” at its UK centres in Cambridge, Canterbury and London. This policy details the purpose, use and management of the CCTV system within CATS Global Schools (CGS) in the UK and details the procedures to be followed in order to ensure that the organisation complies with relevant legislation and the current Information Commissioner’s Office Code of Practice.

1.2 CGS has due regard to the Data Protection Act 2018 (DPA), the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, CGS pays due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles¹ it contains.

1.3 This policy is based upon guidance issued by the Information Commissioner’s Office, ‘*In the picture: A data protection code of practice for surveillance cameras and personal information*’² (“the Information Commissioner’s Guidance”).

1.4 This policy and associated procedures, applies to all of CATS Global School’s CCTV systems in the UK capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

2. CCTV System overview

2.1 The CCTV system is owned and managed by CATS Global Schools (CGS). Under the Data Protection Act 2018 CATS Global Schools (CGS) is the ‘data controller’ for the images produced by the CCTV system. CGS is registered with the Information Commissioner’s Office (ICO). The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner’s Guidance.

2.2 The IT Director is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.

2.3 The CCTV system operates across academic, administrative and residential sites in London, Cambridge and Canterbury.

2.4 Signs are placed at in prominent locations in order to inform staff, students, visitors and members of the public that CCTV is in operation. The signage clearly indicates that the system is managed by CGS and a contact email address is provided for the Data Protection Officer (DPO@catsglobalschools.com).

¹ Surveillance Camera Code of Practice Pursuant to Section 29 of the Protection of Freedoms Act 2012
https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/157901/code-of-practice.pdf

² *In the picture: A data protection code of practice for surveillance cameras and personal information*
<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

2.5 The IT Director is responsible for ensuring that adequate signage is erected in compliance with the Information Commissioner's Guidance, in collaboration with the Head of Operations.

2.6 Cameras are sited to ensure that they cover entrances, exits and vulnerable public-facing areas of the organisation's educational and residential premises.

2.7 Cameras are not positioned to focus on private residential areas and cameras situated in residential accommodation focus on entrances and communal areas. They are not sited in private areas, washrooms or changing rooms.

2.8 The CCTV system is operational and is capable of recording for 24 hours a day, every day of the year. It retains two weeks' rolling history. There is a PC-based client to enable recordings to be viewed.

2.9 Any proposed new CCTV installation is subject to a privacy impact assessment.

2.10 Further information regarding the number and location of CCTV cameras is available from the IT Director via the Data Protection Officer: DPO@catsglobalschools.com.

3. Purposes of the CCTV system

3.1 The principle purposes of CATS Global School's CCTV system are as follows:

- to ensure the safety of staff, students and visitors;
- to assist in the investigation of suspected breaches of policy or regulations by staff, visitors or students;
- for the prevention, reduction, detection and investigation of crime and other incidents.

3.2 The CCTV system will be used to investigate any welfare, safety or security incidents that are reported and which may require review of CCTV footage.

3.3 CGS seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

4. Monitoring and Recording

4.1 Images are recorded on cameras with localised recording capabilities and are viewable in accommodation and welfare service areas by authorised accommodation and welfare staff. Cameras may be monitored overnight by authorised accommodation and welfare supervisors, when accommodation is in use, to ensure student safety and adherence to College rules. Additional staff may be authorised by the Principal/Rector in liaison with the IT Director to monitor cameras sited within their own areas of responsibility on a view-only basis.

4.2 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

4.3 All images recorded by the CCTV System remain the property and copyright of CGS.



4.4 The monitoring of staff activities will be carried out in accordance with Part 3 of the *Employment Practices Code*³.

4.5 It is not currently the policy of the organisation to use covert cameras. Should the need arise, any such request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Head of HR will be sought before the installation of any covert cameras. The Head of HR should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.

4.6 Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there are reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

5. Compliance with Data Protection Legislation

5.2 In its administration of its CCTV system, CGS complies with the Data Protection Act (DPA) 2018 and the General Data Protection Regulation (GDPR). Due regard will be given to the data protection principles contained within Article 5 of the GDPR which provide that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner;
 - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - d) accurate and, where necessary, kept up to date;
 - e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- and*
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6. Applications for disclosure of images

Applications by individual data subjects

6.1 Requests by individual data subjects for images relating to themselves – a “Subject Access Request” should be submitted in writing to the Data Protection Officer DPO@catsglobalschools.com or to the HR Department HR@catsglobalschools.com together with proof of identification.

6.2 In order to locate the images on the CCTV system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

³ https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf



6.3 Where CGS is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Access to and disclosure of images to third parties

6.4 A request for images made by a third party should be made in writing to the Data Protection Officer, IT Director or Principal/Rector who will liaise in response to the request.

6.5 In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

6.6 Such disclosures will be made at the discretion of the IT Director, with reference to relevant legislation and where necessary, following advice from CATS Global School's legal advisor and Data Protection Officer.

6.7 Where a suspicion of misconduct arises and at the formal request of the Head of HR, the IT Director may provide access to CCTV images for use in staff disciplinary cases.

6.8 The IT Director may provide access to recorded CCTV images when required as evidence in relation to student discipline cases, at the request of the Principal/Rector.

6.9 A record of any disclosure made under this policy will be logged by the IT Director, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Retention of images

7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 14 days from the date of recording. Images will be automatically overwritten after this point.

7.2 Where an image is required to be held in excess of the retention period referred to in 7.1, the IT Director or their nominated deputy, will be responsible for authorising such a request with regard to student-related incidents. The Head of HR or their nominated deputy will be responsible for authorising requests to retain information relating to staff incidents.

7.3 Images held in excess of their retention period will be reviewed on a three monthly basis and any not required for evidential purposes will be deleted. Once an investigation and any further appeals have been fully completed, footage should be deleted from its offline storage area.

7.4 Access to retained CCTV images is restricted to the IT Director and other persons as required and as authorised by the IT Director.

8. Complaints procedure

8.1 For complaints concerning CATS Global School's use of its CCTV system or the disclosure of CCTV images please refer to the Complaints Policy, available per centre at www.catseducation.com/policies and www.csvpa.com/about/policies.

9. Monitoring Compliance

9.1 All staff involved in the operation of the CCTV system will be made aware of this policy and will only be authorised to use the CCTV system in a way that is consistent with the purposes and procedures contained therein.

9.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

10. Policy review

10.1 CATS Global School's usage of CCTV and the content of this policy shall be reviewed annually by the IT Director with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.