

Abbey DLD Colleges Ltd.

CCTV Policy

1. Introduction

Closed circuit television (CCTV) is installed across the Abbey DLD Group portfolio (Appendix 1) to provide a safe and secure environment for employees, contractors and visitors, and to protect the property from unlawful damage and unauthorised access.

This policy sets out the use and management of the CCTV equipment and images in compliance with the UK General Data Protection Regulation (UK GDPR) and the ICO CCTV Code of Practice.

Abbey DLD Group's CCTV platform records images only and there is no facility to record audio.

2. Purposes of CCTV

The purposes of Abbey DLD Group installing and using CCTV platforms include:

- To assist in the prevention or detection of crime or equivalent malpractice;
- To assist in the identification and prosecution of offenders;
- To monitor the security across the Abbey DLD Group (Appendix 1) premises;
- To ensure that health and safety rules and Abbey DLD Group procedures are being complied with; and
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary or legal proceedings being instituted against employees, contractors and visitors and to assist in providing relevant evidence.

3. Responsible Parties

College SLT are responsible for the implementation of and compliance with this policy and the operation of the CCTV system. Reviews of this policy and the Abbey DLD Group use of CCTV shall be conducted no less than annually.

Any complaints or enquiries about the operation of the Abbey DLD Group CCTV system should be directed to the College SLT.

4. Location of Cameras

Cameras are located at strategic positions throughout the site where there is a legitimate reason to deter a security breach and record movement at key access / egress points.

5. Signage

Appropriate signs are prominently displayed where CCTV cameras are situated ensuring individuals are made aware they are entering an area covered by CCTV.

6. Recording and Retention of Images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are

effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

Internal high-speed SATA hard disc drives are used to ensure image quality. Where hard disc drive retention fails and/or is no longer required it shall be erased and disposed of securely by an approved electronic waste disposal company.

CCTV images are retained for 31 days before over-write unless required as part of an ongoing prosecution of a criminal offence where they will be kept until completion of the investigation. Incidents can be exported to additional media i.e. flash drives, for evidential purposes.

7. Access to and Disclosure of Images

Under UK GDPR, individuals have the right to request to access and receive a copy of personal data that Abbey DLD Group holds about them, including CCTV images if they are recognisable from the image.

To ensure that the rights of individuals are retained the access to, and disclosure of, images recorded on CCTV is restricted.

Images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to authorised individuals only.

Monitors used to access CCTV images are located in secure areas which are locked when not occupied and access by unauthorised individuals is strictly forbidden.

Where media storing images is removed for viewing purposes, this shall be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness;
- Prosecution agencies, such as the Crown Prosecution Service;
- Relevant legal representatives;
- Authorised individuals involved with a particular site (see appendix 1) or
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).*

*In the case where third parties are present in the image the request will be rejected due to an infringement on the third parties rights, unless consent for their personal data to be used for this purpose has been explicitly granted by the third parties concerned.

The disclosure of images to the parties listed above can only be authorised by a Director of Abbey DLD Colleges Ltd., or College SLT.

All requests for disclosure and access to images will be documented in the CCTV image release record. If disclosure is denied, the reason will be recorded.

For a request to be successful it must be received within 31 days from the date when the images were recorded to ensure the relevant media is available. Where requests have been received in a timely manner the media containing the data shall be retained until the request has been actioned.

Requests will be processed thirty days from receipt of the request.

8. Staff training

College SLT shall ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the rights of individuals with regard to that system.

Appendix 1 – Abbey DLD Colleges Ltd. Sites

- 5-7 Cheapside, Manchester, M2 4WG
- Homerton Gardens, Cambridge, CB2 8EB
- 199 Westminster Bridge Road, SE1 7FX
- 8 Perne Road, Cambridge, CB1 3RU