

CCTV Policy

1. Introduction

City Lit (the College) uses closed circuit television (CCTV) for the primary purposes of: prevention and detection of crime or misconduct, assuring the safety and security of employees, students, visitors and members of the public, and the protection of property while kept on college premises.

The CCTV system (the system) is not used to: provide images to the internet, record sound or for disclosure to the media. This policy does not apply to the recording of classes or other filming that has been undertaken for study reasons.

CCTV digital images, if they show a recognisable person, are personal data and are covered by Data Protection law. This Policy is associated with the College Data Protection Policy, the provisions of which should be adhered to at all times.

The College's CCTV system is necessary for the purposes of pursuing the legitimate interests of the College or a third party working on behalf of the College.

Although every effort has been made to ensure the maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

The College Head of Facilities is responsible for the overall operation of the system and ensuring compliance with this policy. The college has appointed an onsite third party to manage day-to-day operations.

2. Operating Procedures

Images captured by the system are not monitored on a continuous basis. Monitors are located in a secure location and are sited so that they are only viewable by authorised employees/contractors.

Requests to stop recording

Requests to prevent processing that may be deemed to cause substantial and unwarranted damage to an individual must be made to the Data Protection Officer who will liaise with the Head of Facilities to determine whether the request should be complied with.

Employee Training

The Head of Facilities will ensure that employees/contractors handling CCTV images or recordings receive training on the operation and administration of the CCTV system.

Covert recording

The College will only undertake covert recording with the written authorisation of the Executive Director-People or, in their absence, the Head of Human Resources or Chief Finance Officer where:

- informing the individual(s) concerned that the recording is taking place would seriously prejudice the reason for making the recording;
- and there is good cause to suspect that an illegal or unauthorised action(s) is/are taking place or about to take place.

Any such monitoring will only be carried out for a limited and reasonable amount of time consistent with the objectives of the monitoring, and only for a specific unauthorised activity.

All such occasions will be fully documented showing who made the request to use covert monitoring and why.

Maintenance and Quality of images

The system will be regularly checked to ensure that it meets the purposes for which it was installed. Images produced by the recording equipment must be as clear as possible in order that they are effective for the purpose for which they are intended and the date and time stamp recorded on the images is accurate.

Retention

Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for 60 days from the date of recording. If images are requested to be retained for a longer period of time they will be stored securely on an external hard drive until needed and then erased once the request has been dealt with.

Signage

The public and College community will be made aware of the presence of the system by appropriate signage which sets out the purposes for processing the CCTV images and identifies the College as the party responsible for processing those images.

Breaches

Any breaches of this code by employees/contractors monitoring the system or who have access to the monitored images may constitute matters of discipline under the relevant conditions of employment.

3. Access

Access to images will be restricted to those employees/contractors that need to have access in accordance with the purposes of the system.

Personal access

Data Protection law gives individuals the right to access personal information about themselves, including CCTV images. They also have the right to request that their personal data is erased without undue delay in certain circumstances. All requests for access to a copy of CCTV footage by individuals will be made to the Data Protection Officer at data.protectionofficer@citylit.ac.uk who will process the request in accordance with the procedure contained within the College's Data Protection Policy.

External Third party access

Disclosure of recorded material will only be made to external third parties when accompanied by proof of identity and in strict accordance with the purposes of the system and is limited to the following:

- Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and / or the prevention of terrorism and disorder;
- Prosecution agencies e.g. Health & Safety Executive;
- Appropriate employees of the College in the course of employee or student disciplinary proceedings (including prospective proceedings) or investigations to ensure compliance with the College's regulations and policies as determined by the Chief Finance Officer or their nominated representative;
- Appropriate legal representatives as determined by the Chief Finance Officer or their nominated representative.

All third party requests for access to a copy of CCTV footage should be made in writing to the DPO.

4. Contact

For further information relating to the processing of CCTV images by City Lit, please contact:

Data Protection Officer, City Lit, 1-10 Keeley Street, Covent Garden, London, WC2B 4BA at data.protectionofficer@citylit.ac.uk

For further information about individuals' rights in respect of the protection of personal data or to make a complaint please contact:

Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

Telephone: 0303 123 1113

<https://ico.org.uk/make-a-complaint/>

Executive Owner	Chief Finance Officer
Policy Owner	Data Protection Officer
Approval Body	Governing Body
Date Approved	3/12/24
Review Period	Every two years
Next Scheduled Review Data	Two years from date approved

Version tracking

Versions	Date	Author	Reason for changes
1.1	3/2/2020	Graham Jennings	New
1.2	1/10/22	Graham Jennings	Annual review
1.3	13/11/24	Graham Jennings	Biennial Review. Retention period changed to 60 days.