



## Wirral Met College

### POLICY

Wirral Metropolitan College is fully committed to the safety of its staff, students and visitors and to this extent has invested in the security of its buildings and facilities. The purpose of this policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) System installed at *Wirral Metropolitan College*.

CCTV are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 2018. This is the UK law which complements the European Union's General Data Protection Regulation (GDPR).

The system comprises a number of fixed and dome cameras located both internally and externally around the campus. All cameras may be monitored and are only available for use by approved members of staff.

New CCTV systems will be introduced by the Estates department where they are considered a necessary addition. Where systems are already in operation, their operation will be reviewed regularly.

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# Wirral Metropolitan College CCTV Policy

## COVID-19 Pandemic

The information contained within this policy will remain current pending any changes in government, local authority and educational sector guidance pertaining to COVID-19 and the mitigation of infections.

This policy will be reviewed and amended routinely in line with government guidance.

### 1. Purpose Of Policy

***“The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of Wirral Metropolitan College.”***

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at Wirral Metropolitan College is intended for the purposes of:

- protecting the college buildings and college assets, both during and after college hours.
- promoting the health and safety of staff, pupils and visitors.
- preventing bullying.
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- supporting the Police in a bid to deter and detect crime.
- assisting in identifying, apprehending and prosecuting offenders;
- ensuring that the college rules are respected so that the college can be properly managed.
- being a requirement for certain online exams stipulated by the examination body.

### 2. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. Where classes and activities are carried out in rented premises, Wirral Metropolitan College will ensure that CCTV systems, where installed, are operated only in a way that is compatible with the provisions of this policy.

### **3. General Principles**

Wirral Metropolitan College as the corporate body has a statutory responsibility for the protection of its property and equipment, as well providing a sense of security to its employees, students and invitees to its premises. Wirral Metropolitan College owes a duty of care to staff, students and visitors and utilises CCTV systems and their associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of the college community by integrating the best practices governing the public and private surveillance of its premises.

The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance (unless suspected of criminal activity e.g. theft of college property).

Information obtained through the CCTV system may only be released when authorised by the Director of Facilities and Estates, the Facilities Manager, or the ICT Manager. Any requests for CCTV recordings/images from the Police will be fully recorded and legal advice may be sought if any such request is made. (See "Access" below). If a law enforcement authority is seeking a recording for a specific investigation the Director of Facilities and Estates, Facilities Manager or ICT Manager will endeavour to support this request but may seek legal advice.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by Wirral Metropolitan College, including Equality & Diversity Policy, Dignity at Work Policy, Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other educational and related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within Wirral Metropolitan College premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee of the Wirral Metropolitan College or a student attending one of its college/centres.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by Wirral Metropolitan College. Recognisable images captured by CCTV systems are "personal data." They are therefore subject to the provisions of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018.

### **4. Justification For The Use Of CCTV**

Data must be adequate, relevant and not excessive for the purpose for which it is collected. The use of CCTV to control the perimeter of the college buildings for security purposes has been deemed to be justified by the college leadership team. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

CCTV systems will not be used to monitor normal teacher/student classroom activity in college. However, some teaching rooms containing high value computer equipment or those where online examinations are conducted may have CCTV equipment installed.

In other areas of the college where CCTV has been installed, e.g. hallways, stairwells, locker areas, computer rooms, there is a potential risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that have arisen prior to the installation of the system. Additionally, CCTV is used for monitoring online examinations. The CiTB (Construction Industry Training Board) and other exam bodies eg Pearson require CCTV monitoring and have strict guidelines regarding recording of candidates during their examinations. Specific cameras have been installed for this purpose – these are used in a system separate from the main security CCTV overseen by the Estates department. This ‘exam CCTV’ can be monitored by specified members of the college staff responsible for overseeing online examinations.

## **5. Location Of Cameras**

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Wirral Metropolitan College has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas in Wirral Metropolitan College may include the following:

- *Protection of college buildings and property:* The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services.
- *Monitoring of Access Control Systems:* Monitor and record restricted access areas at entrances to buildings and other areas
- *Verification of Security Alarms:* Intrusion alarms, exit door controls, external alarms
- *Video Patrol of Public Areas:* Parking areas, Main entrance/exit gates, Traffic Control
- *Criminal Investigations (carried out by the Merseyside Police):* Robbery, burglary and theft surveillance

## **6. Covert Surveillance**

Wirral Metropolitan College will not engage in covert surveillance.

Where the Police request to carry out covert surveillance on college premises, such covert surveillance may require the consent of an appropriate authority. Accordingly, any such request made by the Police will be considered by Director of Facilities & Estates before granting access.

## **7. Notification - Signage**

The College will provide a copy of this CCTV Policy on request to staff, students, parents and visitors to the college. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. Adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation. Adequate signage will also be prominently displayed at the entrance to Wirral Metropolitan College property. Signage shall include the name and

contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.



**WARNING**

**CCTV cameras in operation  
Images are being monitored for the purposes of crime-prevention and public safety.**

**This scheme is controlled by Wirral Metropolitan College**

**For more information contact: Director of Facilities & Estates 0151 551 7458**

Appropriate locations for signage will include:

- at entrances to premises i.e. entrance to car parks
- reception area
- In examination rooms. These will show signs detailing relevant information around the use of CCTV for monitoring of online examinations.

## **8. Storage and Retention**

Data should not be kept for longer than is necessary for the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (30 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Director of College Services, Facilities Manager or ICT Manager. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above (such individuals may include the Police). When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Media used for recordings will be stored in a secure environment. Access to the CCTV system will be restricted to authorised personnel. Similar measures will be employed when using disk storage, with automatic logs of access to the images created.

## 9. Access

As well putting new obligations on the companies and organisations collecting personal data, the GDPR also gives individuals a lot more power to access the information that's held about them.

A Subject Access Request (SAR) allows an individual the ability to ask a company or organisation to provide data about them. Under GDPR rules it is free to ask for your information. There is a 40 calendar day time limit to respond to the request. Everyone has the right to get confirmation that an organisation has information about them, access to this information and any other supplementary information

Access to the CCTV system and stored images will be restricted to authorised personnel only.

Intended use of any footage, with reference to staff members, will be at the discretion of the Director of Facilities and Estates, in consultation with Human Resources and the Senior Leadership Team.

In relevant circumstances, CCTV footage may be accessed:

- By the Police where Wirral Metropolitan College are required by law to make a report regarding the commission of a suspected crime.
- Following a request by the Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place at Wirral Metropolitan College property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the Principal in establishing facts in cases of unacceptable student behaviour, in which case, the parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to Wirral Metropolitan College or
- To individuals (or their legal representatives) subject to a court order.
- To Wirral Metropolitan College's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.
- Live CCTV streams may be viewed by exams officers conducting online exams – this is on a separate system to the main security CCTV system.

**Access requests:** On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release. Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable. To exercise their right of access, a data subject must make an application in writing to the Director of Facilities and Estates.

Access requests can be made to the following: *Director of Facilities & Estates at Wirral*

### *Metropolitan College.*

A person should provide all the necessary information to assist in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is of such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the College.

In giving a person a copy of their data, the College may provide them in physical format as a still/series of still printed pictures or in electronic format e.g. on a USB disk with relevant images. However, other images of other individuals will be obscured before the data is released.

## **10. Responsibilities**

### **Director of Facilities & Estates will:**

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down herein.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Wirral Metropolitan College.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy .
- Ensure that the CCTV monitoring at Wirral Metropolitan College is consistent with the highest standards and protections .
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy .
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally .
- Approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events.  
*NOTE: [Temporary cameras do not include mobile video equipment or hidden surveillance cameras used for authorised criminal investigations by the Police].*
- Give consideration to both students and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment .
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the college and be mindful that no such infringement is likely to take place.
- Co-operate with the Health & Safety Officer of Wirral Metropolitan College in reporting on the CCTV system in operation in the college.
- Ensure that adequate signage at appropriate and prominent locations is displayed as detailed above.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy.”
- Ensure that media storing images are stored in a secure place with access by authorised personnel only.
- Ensure that images recorded on DVDs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the College Principal.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.

*Uncontrolled document when printed, refer to staff intranet for current version*

- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

## **11. Implementation and Review**

The policy will be reviewed and evaluated annually. On-going review and evaluation will take cognisance of changing information or Government guidelines, national management bodies, legislation and feedback from parents/guardians, students, staff and others.

Implementation of the policy will be monitored by Director of Facilities & Estates.

## **Appendix 1 – Definitions**

### **Definitions of words/phrases used in relation to the protection of personal data and referred to in the text of the policy;**

**CCTV** – Closed-circuit television is the use of video cameras to transmit a signal to a specific place on a limited set of monitors. The images may then be recorded on video tape or DVD or other digital recording mechanism.

**GDPR** - GDPR is Europe's framework for data protection laws – it replaces the previous 1995 data protection directive. Previous UK law was based upon this directive.

**The Data Protection Act** – The Data Protection Act 2018 is a United Kingdom Act of Parliament which updates data protection laws in the UK. It is a national law which complements the European Union's General Data Protection Regulation (GDPR).

**Data** - information in a form that can be processed. It includes automated or electronic data (any information on computer or information recorded with the intention of putting it on computer) and manual data (information that is recorded as part of a relevant filing system or with the intention that it should form part of a relevant filing system).

**Personal Data** – Personal data can be anything that allows a living person to be directly or indirectly identified. This may be a name, an address, or even an IP address. It includes automated personal data and can also encompass pseudonymised data if a person can be identified from it.

**Sensitive Personal Data** - GDPR calls sensitive personal data as being in 'special categories' of information. These include trade union membership, religious beliefs, political opinions, racial information, and sexual orientation.

**Subject Access Request** – this is where a person makes a request to the organisation for the disclosure of their personal data.

**Data Processing** - performing any operation or set of operations on data, including:

- Obtaining, recording or keeping the data,
- Collecting, organising, storing, altering or adapting the data,
- Retrieving, consulting or using the data,
- Disclosing the data by transmitting, disseminating or otherwise making it available,
- Aligning, combining, blocking, erasing or destroying the data.

**Data Subject** – an individual who is the subject of personal data.

**Data Controller** - a person who (either alone or with others) controls the contents and use of personal data.

**Data Processor** - a person who processes personal information on behalf of a data controller, but does not include an employee of a data controller who processes such data in the course of their employment, for example, this might mean an employee of an organisation to which the data controller out-sources work. The Data Protection Act places responsibilities on such entities in relation to their processing of the data.

Appendix 2

Wirral Metropolitan College

CCTV Operations System  
Data Protection Act 2018



Wirral Met College

Request from Police or other Government agency for data held on CCTV.

<b>Date &amp; Time of Incident</b>	
<b>Details of Incident:</b>	
<b>Signature of Police/Government Officer:</b>	
<b>Print Name of Police/Government Officer:</b>	
<b>Incident Report Number/Memory stick</b>	
<b>Date &amp; Time of removal of images:</b>	
<b>Name of person removing images:</b>	
<b>Name(s) of person(s) viewing images</b>	
<b>If third party viewing images, give details of organisation:</b>	
<b>The reason for viewing:</b>	
<b>The outcome, if any of the viewing:</b>	

**Appendix 3**

**Wirral Metropolitan College**

**CCTV Operations System  
Data Protection Act 2018**



**Request from College Managers for data held on CCTV.**

<b>Date &amp; Time of Incident</b>	
<b>Details of Incident:</b>	
<b>Signature of College Manager:</b>	
<b>Print Name of College Manager:</b>	
<b>Incident Report Number</b>	
<b>Date &amp; Time of removal of images:</b>	
<b>Name of person removing images:</b>	
<b>Name(s) of person(s) viewing images</b>	
<b>If third party viewing images, give details of organisation:</b>	
<b>The reason for viewing:</b>	
<b>The outcome, if any of the viewing:</b>	