



## CCTV POLICY

<b>POLICY INTENDED FOR:</b>	Staff
<b>CATEGORY:</b>	IT Policies
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<b>POLICY IMPLEMENTED BY:</b>	Principal
<b>POLICY MONITORED BY:</b>	Principal and Operations Manager
<b>REVIEWED BY:</b>	Principal
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<b>CONSULTATION WITH:</b>	Senior Leadership Team (SLT)
<b>RECORD OF CHANGES &amp; ADDITIONS:</b>	None
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## Contents

CCTV Policy.....	1
Purpose.....	3
Operation of the system.....	3
Legislative framework.....	3
Individual access rights.....	3
Third party access.....	4
Requests to prevent processing.....	4
Retention and disposal.....	4
Limits on use of CCTV and covert monitoring.....	5
Further Information.....	6

### PURPOSE

This policy sets out the accepted use of CCTV in the workplace to ensure that Oxford International College complies with its legal obligations and respects the individual privacy of its students, staff, contractors and visitors.

Oxford International College uses CCTV in its legitimate interests to deter and assist in the prevention or detection of crime, monitor security and identify actions which might result in disciplinary action.

### OPERATION OF THE SYSTEM

The CCTV monitoring system will be provided and operated in a way that is consistent with an individual's right to privacy.

Cameras are located:

- On all floors of teaching facilities in communal areas such as;
  - Reception Area
  - Common Areas
  - Stairways
  - G8 (code-locked door)
- In Communal areas, Staff Offices and Access Points at Boarding Houses

### LEGISLATIVE FRAMEWORK

General Data Protection Regulations (GDPR) 2018. This covers the rights of individuals (data subjects) in respect of their personal data. Identifiable images of individuals are personal data.

The Human Rights Act 1998 (HRA) enshrines "respect for private and family life."

The data controller is Oxford International College. The organisation has appointed Claire Wellstood as its Compliance Officer [protectingdata@oxcoll.com](mailto:protectingdata@oxcoll.com).

### INDIVIDUAL ACCESS RIGHTS

GDPR gives individuals the right to access personal information about themselves, including images.

All requests for access to a copy of video footage by individuals should be made in writing to the Compliance Officer [protectingdata@oxcoll.com](mailto:protectingdata@oxcoll.com).

Requests for access to CCTV images must include: OIC CCTV Policy 2020

- The date and time the images were recorded;
- Information to identify the individual if necessary;
- Proof of identity; and
- The location of the camera.

If Oxford International cannot comply with the request, the reasons will be documented.

### **THIRD PARTY ACCESS**

Disclosure of images to third parties is limited to the following:

- Parties who share responsibility for leased property (i.e. management companies of boarding facilities)
- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry);
- Prosecution agencies;
- Appropriate members of Oxford International College staff, in the course of staff or student disciplinary proceedings or prospective proceedings, to ensure compliance with the organisation's regulations and policies; and
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries).
- IT Support Suppliers who maintain systems

### **REQUESTS TO PREVENT PROCESSING**

In addition to rights of access, data subjects also have rights under the GDPR to prevent processing (i.e. monitoring and recording CCTV images) likely to cause substantial and unwarranted damage to that person.

If a data subject has any concerns regarding the operation of the CCTV system, the data subject should be directed to the Data Protection Officer. Where a request to prevent processing is made, this will be considered by the Data Protection Officer. A copy of the request and response will be retained.

### **RETENTION AND DISPOSAL**

Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than 1 month from the date of recording.

At the end of their useful life all images stored in whatever format will be erased securely and permanently.

#### LIMITS ON USE OF CCTV AND COVERT MONITORING

The organisation will not use CCTV for monitoring the work of employees.

Areas where a high level of privacy is expected, such as toilets or changing rooms, will remain private.

Covert CCTV will only ever be set up for the investigation or detection of crime or serious misconduct. The use of covert CCTV will be justified only in circumstances where the investigator has a reasonable suspicion that the crime or serious misconduct is taking place and where CCTV use is likely to be a proportionate means of securing evidence.

### FURTHER INFORMATION

For further information about CCTV at OIC please speak with Claire Wellstood.

[claire.wellstood@oxcoll.com](mailto:claire.wellstood@oxcoll.com)

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