



Data Protection and Use of CCTV Policy & Procedures

Owner Data Protection Officer

Date reviewed: October 2020

Date for next review: October 2020

1. INTRODUCTION

- 1.1. Oarsome Chance is required to adhere to the General Data Protection Regulations (GDPR), with respect to all information or data held about students, employees and visitors including any data captured on CCTV.
- 1.2. Oarsome Chance uses closed circuit television (CCTV) images to provide a safe and secure environment for students, staff and visitors and to protect Oarsome Chance property. CCTV operates both at Oarsome Chance, The Boathouse, Mill Lane, Gosport and Apex centre, Leigh Park, Havant.
- 1.3. The purpose of this policy is to regulate the management, operation and use of CCTV systems at Oarsome Chance.
- 1.4. The Policy is intended to ensure that Oarsome Chance operates the CCTV system in compliance with GDPR, the Information Commissioner's CCTV Code of Practice and other relevant legislation.

2. PURPOSE OF THE CCTV SYSTEM

- 2.1. Oarsome Chance has installed the CCTV system to:
 - Deter crime
 - Increase personal safety and reduce the fear of crime
 - Assist in the prevention and detection of crime
 - Assist with the potential investigation and identification of offenders
 - Protect Oarsome Chance buildings and property
 - Assist with the identification of actions that might result in disciplinary proceedings against students, staff or visitors
 - Assist in the management and monitoring of Oarsome Chance facilities including the investigation of accidents
 - As a means of assistance to staff in case of emergency situations
- 2.2. The system comprises a number of cameras all of which are static. These cameras are located around Oarsome Chance building and sites. The location and type of each camera is held in the CCTV Operating File in the office.
- 2.3. The camera locations were determined by risk assessment as High, Medium or Low level risk with the assistance of historical data and incident

reports.

- 2.4. The CCTV systems are owned and operated by Oarsome Chance. The Oarsome Chance Principal has overall responsibility for the CCTV systems. The Oarsome Chance team are responsible for the day to day operation of the system.
- 2.5. The servers which support the cameras and record the images captured are kept in a secure location, the Oarsome Chance office in Gosport (Control Room). Oarsome Chance understands that all systems, information, documents and recordings obtained and used as data is protected by the GDPR. The viewing and copying of the images will be strictly controlled. Provision of images to external agencies will only be provided in line with paragraph 4 below.
- 2.6. The images captured by the cameras are recorded continuously. The images can be viewed when there has been a specific event and in line with the guidance in paragraph 4.

3. DESIGN AND OPERATION OF THE SYSTEM

- 3.1. The static cameras have been directed where they will not focus on private homes, gardens and other areas of private property. Their positioning is checked on a regular basis by staff to ensure that they have not moved and this will be recorded in the CCTV Operating File.
- 3.2. Live images from these cameras are regularly monitored and recorded on a continuous basis.
- 3.3. Staff must not direct cameras at an individual, their property or a specific group of individuals. The exception to this would be in cases where written authorisation has been obtained from the Principal for directed surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.
- 3.4. Warning signs have been placed in all external areas where CCTV is operational. In addition further signs have been placed internally within Oarsome Chance.
- 3.5. All sign locations and content are compliant with the Information Commissioner's Code of Practice.

4. VIEWING AND STORING OF IMAGES

- 4.1. The following members of staff are authorised to view images captured by the CCTV system:
 - Permanent members of Oarsome Chance senior management Team
 - The Principal
 - The Data Protection Officer
 - External CCTV providers (engineers for the purpose of maintenance)
 - Any other staff as required to assist in the identification of students following an incident
- 4.2. Office staff and management will view live images of the system at all times while Oarsome Chance is open.
- 4.3. Images from the CCTV systems can only be viewed within the CCTV Control Room.
- 4.4. Viewing of CCTV images will only take place in the above restricted area to which other employees will not have access while viewing is occurring. The exception to this is when a member of the Senior Management Team

has requested a copy of CCTV footage for potential disciplinary proceedings when they must ensure the footage is viewed in a private area and only viewed by those persons pertinent to the investigation. Once the investigation is complete the footage must be returned to the Security Control room where it will be stored securely.

- 4.5. Other than detailed in 4.1 above images captured by the system will only be shared with law enforcement agencies where a crime needs to be investigated. Any other requests for images should be refused, except in very limited circumstances where it may be appropriate to release images to a third party. In such cases the agreement of the Principal and the Data Protection Officer must be sought before this information is released.
- 4.6. Materials and images from the CCTV system will not be used for any commercial purpose or released to the media.
- 4.7. When images are provided to any external body, including the police, this will be done by downloading the information onto a CD or memory stick. The following information will be recorded in the CCTV Operating File for every CD or memory stick produced:
 - The date and time the information was provided to the external body
 - The details of the person to whom the information has been provided, including their employing organisation and contact details
 - The date and time covered by the images on the CD/Memory stick and the cameras on which they had been captured
 - The name of the person and their job title transferring the images onto the CD/Memory stick.
- 4.8. Information stored on the system constitutes personal data as defined by the GDPR. An individual may ask to see images of themselves via a Subject Access Request.
- 4.9. There will be no disclosure of recorded data to third parties other than the authorised organisations such as the Police and others given permission by the Principal or Data Protection Officer for a specific purpose, for example other investigations (see 4.5).

5. RETENTION

- 5.1. Images recorded by the system will not be kept any longer than is necessary and for a maximum of 2 months except in circumstances such as where a law enforcement body is investigating a crime, the footage is required for insurance purposes or as part of an ongoing investigation. In such cases these images will be downloaded onto a disc and secured in a safe place in the office. Access to this is limited to the Oarsome Chance management personnel.
- 5.2. A record will be kept in the CCTV Operating File of any images kept after the 2 month time period and the reason for this.

6. MAINTENANCE OF THE SYSTEM

- 6.1. The Security Personnel will check and confirm the efficiency of the system on a daily basis. In particular they will ensure that the equipment is recording properly, the cameras are functional, image

quality is suitable for the purpose for which it is intended and the date and time stamp on the image is accurate. These checks will be recorded in the CCTV Operating File. Any faults will be reported immediately to the Head of Health, Safety, Security and Safeguarding who will ensure the service provider is informed immediately, this will be recorded in the CCTV Operating File.

- 6.2. Any maintenance, planned or unplanned, will be recorded in the CCTV Operating File as will any alterations/additions to the CCTV system. In the event that the CCTV system is altered for example if further cameras are added, this policy will be reviewed to ensure it is still fit for purpose.

7. BREACHES OF THE CODE

- 7.1. Any breach of this policy by Oarsome Chance staff will be investigated initially by an Officer appointed by the Principal and may be dealt with under the disciplinary procedure.
- 7.2. Any complaints about the operation of the CCTV system should be addressed to the Principal and dealt with under Oarsome Chance complaints procedure.

8. STAFF GUIDANCE AND TRAINING

- 8.1. All staff are made aware of the CCTV Policy and will be able to access a copy through Oarsome Chance intranet system.
- 8.2. Staff authorised to operate the system and view images will be provided with guidance and training on their obligations under this Policy. Staff will be asked to confirm their understanding of the Policy and the requirements of the GDPR.

9. REVIEW OF THE POLICY

- 9.1. The Policy will be subject to regular review or where there are any alterations/additions to the system as specified in 6.2. The review will be in consultation with relevant parties.