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| Document Name: | CLOSED CIRCUIT TELEVISION (CCTV) |
| Document Type: | Policy and Procedure |

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| Document Information |
| Scope: Under the Data Protection Act the PVC Board are the Data Controller and legally responsible for the CCTV system. Day to day compliance with the requirements of the Code of Practice lies with the Centre Manager. |
| Key Objectives: The CCTV system has been installed following a number of incidents where Centre staff had unnecessary encounters with members of the public. Key objectives are public and employee safety, security measures against theft and damage to PVC property, prevention and detection of crime, apprehension and prosecution of offenders, visibility within the building from the main office in support of these objectives. |
| Outcomes: It is hoped that the presence of the CCTV system will act as a deterrent to crime and will allow a limited capability to detect and prosecute offenders. |

Introduction

1. The Centre 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 the Centre 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 Centre facilities including the investigations of accidents
 - As a means of assistance to staff in case of emergency situations
 - Objective 5 – Visibility within the building from the main office in support of objectives 1-4.

They provide a central view of the Centre and record any incidents occurring. CCTV images may also be used as evidence in staff disciplinary matters. The system does not cover the exterior of the building.

2. The system comprises of a number of cameras around the Centre.
3. Additional benefits of the system are objectives 3 and 4 although they were not the key drivers for installing the system. It is hoped that the presence of the CCTV system will act as a deterrent to crime and will allow a limited capability to detect and prosecute offenders. In the future further cameras may need to be added should the Centre extend into other areas. An annual review to evaluate the effectiveness of the scheme against its purpose as well as compliance with legal obligations and provisions will be provided to Board where action to discontinue or modify may be taken.

Operational Responsibility

4. The operation of the system is the responsibility of the Data Controller who delegate their authority and responsibility to the Centre Manager who is responsible for:
 - Ensuring signage is displayed throughout the Centre
 - Regularly checking system operation and performance
 - Accurate time and location information.
 - Forwarding of SAR requests to the Data Protection Officer.
 - System maintenance and control over access to the system.
 - Repair of damaged equipment in reasonable period of time.
 - Training of Centre staff.
 - Maintenance of the system logbooks for the system.

Employee Awareness

5. All employees with access to images are aware of the procedures which need to be followed when accessing recorded images.
6. All employees are trained with their responsibilities under the Code of Practice.
7. All employees are able to recognise a request for access to recorded images by data subjects.
8. All employees are able to recognise a request from an individual to prevent processing (though not necessarily recording) likely to cause substantial and unwarranted damage to that individual.

Processing, Retention and Access

9. Images are retained for a period of 7 days, unless required for evidential purposes or access request consideration.
10. If the images are to be retained they will be removed from the system (by transfer to computer, CD or other media; or still images may be printed) and retained in a secure place, such as a safe. This is the responsibility of the Centre Manager and Data Protection Officer.
11. The official removing of images is documented in the Removal of Images Log (Example located at Appendix C).
12. Access to recorded images is restricted to the Data Protection Officer and Centre Manager who will decide whether to allow requests for access in accordance with the Data Protection Act 1998.
13. Disclosure of images to third parties is limited to the following:
 - Law enforcement agencies where the images recorded would assist in a specific criminal enquiry
 - Prosecution agencies
 - Legal representatives
 - The media, where it is assessed by the Police that the public's assistance is needed in order to assist in the identification of a victim, witness or perpetrator in relation to a criminal incident. As part of that assessment the wishes of the victim of an incident should be taken into account.
 - The people whose images have been recorded and retained (unless disclosure to an individual would prejudice the criminal enquiries or criminal proceedings).
 - All requests for access or disclosure are recorded. If the access or disclosure is denied the reason is documented in the CCTV Logbook. The release of any images must be approved and requests addressed by the Data Protection Officer and Centre Manager.
14. When access or disclosure of images is allowed or denied the information is documented on the Disclosure/Non-Disclosure Log. (See Appendix C).

15. All Subject Access Requests are dealt with in accordance with the Group Subject Access Request Procedure.

Operation Procedures

16. The day to day operation of the system is monitored by the Centre Manager and weekly entries made on the CCTV inspection log (See Appendix A).
17. The CCTV system has a maximum of 7 cameras and records the images in colour to a hard disk unit within the system. The hard disk will hold 7 days of recordings and will then be fully erased. The cameras commence recording when motion is detected and continue to record for 5 minutes after motion ceases. There is no operator involved in the day to day recording of images.
18. In normal operation only those cameras activated and recording can be viewed. Cameras can be viewed either individually or in a multi sequence. The screen to view the cameras is not switched on unless required.
19. If an incident occurs an incident report sheet is completed and the details recorded on the CCTV Recording an Incident log (See Appendix A).

Complaints

20. Complaints regarding the use of the system or complaints regarding any not compliance with the CCTV code of practice should be referred to the ICO.

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