

Kings International College for Business & the Arts

CCTV System Policy

1. Introduction

1.1 This policy is designed to ensure compliance with the Regulation of Investigatory Powers Act 2000 (RIPA 2000), the associated Codes of Practice and the implications for covert surveillance under the Human Rights Act.

1.2 The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Kings International College hereafter referred to as 'the College'.

1.3 The College operates overt CCTV with the purpose of reducing crime and the fear of crime for students, staff and visitors. The College also recognises that from time to time there will be a need to authorize the use of covert surveillance. Authorisation for this type of investigation will only be sought in cases where other forms of inquiry have been exhausted or where covert surveillance is the only practical way of pursuing an investigation. The system comprises a number of fixed and dome cameras located in and around the College site. All cameras are monitored from a Central Control Room and are only available to selected senior staff on the Administrative Network.

1.4 Authorisation for these operations will only be granted in circumstances that meet the requirements set out in Section 26[2] of the Regulations of Investigatory Powers Act 2000.

1.5 Procedures for authorization are at Annex A to this policy.

1.5 This Code follows Data Protection Act guidelines.

1.6 The Code of Practice will be subject to reviewed every three years to include consultation as appropriate with interested parties.

1.7 The CCTV system is owned by the College.

2. Objectives of the CCTV scheme

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- (a) To protect the College buildings and their assets
 - (b) To increase personal safety and reduce the fear of crime
 - (c) To support the Police in a bid to deter and detect crime
 - (d) To assist in identifying, apprehending and prosecuting offenders
 - (e) To protect members of the public and private property
 - (f) To assist in managing the College

3. Statement of intent

3.1 The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

3.2 The College will treat the system and all information, documents and recordings obtained and used as data which are protected by the Act.

3.3 Cameras will be used to monitor activities within the College and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived,

and for the purpose of securing the safety and well being of the College, together with its visitors.

3.4.1 Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

3.4.2 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the College's forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.

3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Tapes will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Tapes will never be released to the media for purposes of entertainment.

3.6 The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3.7 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the school CCTV.

4. Operation of the system

4.1 The Scheme will be administered and managed by the College Head of College, in accordance with the principles and objectives expressed in the code.

4.2 The day-to-day management will be the responsibility of both the College Leadership Team and the Site Manager during the day and the Site Team out of hours and at weekends.

4.3 The Control Room will only be staffed by CLT and the Site Team.

4.4 The CCTV system will be operated 24 hours each day, every day of the year.

4.5 Data is recorded on a 7 day cycle, then overwritten.

5. Control Room

5.1 The Site Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

5.2 Access to the CCTV Control Room will be strictly limited to the CLT & the Site Team.

5.3 Unless an immediate response to events is required, staff in the CCTV Control Room must not direct cameras at an individual or a specific group of individuals.

5.4 Visitors and other contractors wishing to enter the Control Room will be subject to particular arrangement as outlined below.

5.5 Control Room Operators must satisfy themselves over the identity of any other visitors to the Control Room and the purpose of the visit. Where any doubt exists access will be refused. Details of all visits and visitors will be endorsed in the Control Room log book.

5.6 The system may generate a certain amount of interest. It is vital that operations are managed with the minimum of disruption. Casual visits will not be permitted. Visitors must first obtain permission from the System Manager or his deputy and must be accompanied by him throughout the visit.

5.7 Any visit may be immediately curtailed if prevailing operational requirements make this necessary.

5.8 If out of hours emergency maintenance arises, the Control Room Operators must be satisfied of the identity and purpose of contractors before allowing entry.

5.9 A visitors book will be maintained in the Control Room. Full details of visitors including time/date of entry and exit will be recorded.

5.10 There must always be at least one Control Room Operator present within the Control Room out of hours and weekends or the Control Room must be locked. During the working day when not manned the room must be kept secured.

5.11 Other administrative functions will include maintaining video tapes and hard disc space, filing and maintaining occurrence and system maintenance logs.

5.12 Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. Liaison

6.1 Liaison meetings may be held with all bodies involved in the support of the system.

7. Monitoring procedures

7.1 Camera surveillance may be maintained at all times.

7.2.1 A monitor is installed in the Control Room to which pictures will be continuously recorded.

7.2.2 If covert surveillance is planned or has taken place copies of the Authorisation Forms, including any Review, or Cancellation must be returned to the Head of College. The corporate policy and procedures are at Annex A.

8. Video tape/Data procedures

8.1 In order to maintain and preserve the integrity of the tapes used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- (i) Each tape must be identified by a unique mark.
- (ii) Before using each tape must be cleaned of any previous recording.
- (iii) The controller shall register the date and time of tape insert, including tape reference.
- (iv) A tape required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence tape store. If a tape is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the controller, dated and returned to the evidence tape store.
- (v) If the tape is archived the reference must be noted.

8.2 Tapes may be viewed by the Police for the prevention and detection of crime, authorised demonstration and training.

8.3 A record will be maintained of the release of tapes to the Police or other authorised applicants. A register will be available for this purpose.

8.4 Viewing of tapes by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

8.5 Should a tape be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. Tapes will only be released to the Police on the clear understanding that the tape remains the property of the school, and both the tape and information contained on it are to be treated in accordance with this code. The College also retains the right to refuse permission for the Police to pass to any other person the tape or any part of the information contained thereon. On occasions when a Court requires the release of an original tape this will be produced from the secure evidence tape store, complete in its sealed bag.

8.6 The Police may require the College to retain the stored tapes for possible use as evidence in the future. Such tapes will be properly indexed and properly and securely stored until they are needed by the Police.

8.7 Applications received from outside bodies (e.g. solicitors) to view or release tapes will be referred to the Head of College. In these circumstances tapes will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be

charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

9. Breaches of the code (including breaches of security)

9.1 Any breach of the Code of Practice by College staff will be initially investigated by the Head of College, in order for him/her to take the appropriate disciplinary action.

9.2 In cases where there has been a serious breach, e.g. surveillance without authorisation or continued surveillance without the appropriate renewal notice being granted the College, could face a civil action brought by the person under investigation, as such surveillance would be against the law and thus an infringement on the individuals human rights. The individual concerned would then have the right of redress against the College through a civil action.

9.3 Where such breaches occur, the College in conjunction with the relevant authorities will carry out a full investigation and make recommendations as to how the breach can be remedied.

10. Assessment of the scheme and code of practice

10.1 Performance monitoring, including random operating checks, may be carried out by the Site Manager.

11. Complaints

11.1. Any complaints about the College CCTV system should be addressed to the Head of College.

11.2 Complaints will be investigated in accordance with Section 9 of this Code.

12. Access by the Data Subject

12.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

12.2 Requests for Data Subject Access should be made on an application form available from the Head of College.

13. Public information

Copies of this Code of Practice will be available to the public from the College website and the Head of College.

Summary of Key Points

This Code of Practice will be reviewed every two years.

The CCTV system is owned and operated by the College.

The Control room will not be manned out of College hours.

The Control Room is not open to visitors except by prior arrangement and good reason.

Liaison meetings may be held with the Police and other bodies.

Recording tapes will be used properly indexed, stored and destroyed after appropriate use.

Tapes may only be viewed by Authorised College Officers, Control Room staff and the Police.

Tapes required as evidence will be properly recorded witnessed and packaged before copies are released to the Police.

Tapes will not be made available to the media for commercial or entertainment.

Tapes will be disposed of securely by incineration.

Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the corporate policies and procedures. Contact the Corporate Information Manager (& Data Protection Officer) Legal Services Room G81, County Hall Penrhyn Road Kingston upon Thames SURREY,KT12DN
Tel: 020 8541 9635 if you require more information.

Any breaches of this code will be investigated by the Head of College. An independent investigation will be carried out for serious breaches.

Breaches of the code and remedies will be reported to the Head of College.