



### 1.0 Policy Statement and Purpose

- 1.1 Huddersfield New College has in place a closed circuit television (CCTV) system to provide a safe and secure environment for students, staff and visitors, and to protect College property.

The system is owned by Huddersfield New College and images from the system are strictly controlled and monitored by authorised personnel.

This document sets out the accepted use and management of the CCTV system and images to ensure the College complies with the Data Protection Act 1998 (DPA).

This policy has been prepared from the standards set out in the Information Commissioner's CCTV Code of Practice 2014 and the Surveillance Camera Code of Practice 2014 published by the Home Office. Its purpose is to ensure that the CCTV system is used to create a safer environment for staff, students and visitors to the college and its partners to ensure that its operation is consistent with the obligations on the college imposed by the Data Protection Act 1998.

For the full CCTV Code of Practice 2014 and the Surveillance Camera Code of Practice 2014 please click on the following link:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/204775/Surveillance\\_Camera\\_Code\\_of\\_Practice\\_WEB.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/204775/Surveillance_Camera_Code_of_Practice_WEB.pdf)

- 1.2 The main objectives of this policy are to:

- Help maintain a safe environment for students, staff and others, which supports their safety and welfare
- Monitor security of college buildings
- Assist in the prevention and detection of crime
- To monitor on campus parking of staff, students and college visitors.

### 2.0 Purpose of the system

- 2.1 Overview of the system

- The CCTV system includes 58 cameras over 5 buildings (this may alter due to operational changes as governed under the CCTV Code of Practice and the Surveillance Camera Code of Practice 2014).
- The CCTV system runs 24 hours a day, 7 days a week.
- The CCTV system comprises fixed position cameras; monitors; multiplexers; digital recorders and public information signs.
- CCTV signs will be prominently placed at strategic points and at entrance and exit points of the campus to inform staff, students, visitors and members of the public that a CCTV installation is in use. They will provide contact details for the Director of Estates and will explain the purpose of the system.

- Although every effort has been made to ensure maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

## 2.2 The use of the system will:

- always be for the purpose specified which is in pursuit of a legitimate aim and necessary to meet an identified pressing need;
- take into account its effect on individuals and their privacy;
- have as much transparency as possible, including a published contact point for access to information and complaints;
- have clear responsibility and accountability for all surveillance activities including images and information collected, held and used;
- have clear rules, policies and procedures in place and these must be communicated to all who need to comply with them;
- have no more images and information stored than that which is strictly required;
- restrict access to retained images and information with clear rules on who can gain access;
- consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards;
- be subject to appropriate security measures to safeguard against unauthorised access and use;
- have effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with;
- be used in the most effective way to support safety and law enforcement with the aim of processing images and information of evidential value, when used in pursuit of a legitimate aim; and,
- be accurate and kept up to date when any information is used to support a surveillance camera system which compares against a reference database for matching purposes.

## 3.0 Owner

- 3.1 The CCTV surveillance system is owned by Huddersfield New College. The Director of Estates (SPOC – senior point of contact) is responsible for the day-to-day operation of the system and ensuring compliance with this policy.

### Contact details:

Mark Hirst  
Director of Estates  
Huddersfield New College  
New Hey Road  
Huddersfield  
HD3 4GL

**Telephone Number:** 01484 504604

**Email:** [m.hirst@huddnewcoll.ac.uk](mailto:m.hirst@huddnewcoll.ac.uk)

## **4.0 Covert recording**

- 4.1 Covert cameras may be used under the following circumstances on the written authorisation of the Director of Estates.
- That informing the individuals concerned that recording was taking place would seriously prejudice the objective of making the recording; and,
  - There is a reasonable cause to suspect activity is taking place or is about to take place that may seriously or substantially affect the operation of Huddersfield New College.
- 4.2 Prior to authorisation the requesting applicant must have demonstrated and documented that all reasonable procedures and practices were put in place to prevent suspected illegal or unauthorised activity from taking place.
- 4.3 Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.
- 4.4 The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.
- 4.5 Unless required for evidential purposes or the investigation of crime or otherwise required by law, covertly recorded images will be retained for no longer than 31 days from the date of recording.

## **5.0 Data Protection Act 1998**

- 5.1 For the purpose of the Data Protection Act 1998 Huddersfield New College is the data controller. CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act 1998.

## **6.0 Recording and retention**

- 6.1 As in accordance with the Information Commissioner's CCTV Code of Practice 2014 recorded material will be stored in a way that maintains the integrity of the information. This is to ensure that the rights of individuals recorded by surveillance systems are protected and that the information can be used effectively for its intended purpose.
- 6.2 Images will be recorded and normally kept for 30 days, after which time they will be erased. Longer retention periods may be used where there is a specific business need or justification. This will be authorised by the Director of Estates.
- 6.3 In the event of a specific case or investigation, copies of footage may be retained for longer than the standard period. This will be authorised by the Director of Estates and logged. The eventual date of erasure will also be recorded.

## **7.0 Disclosure to third parties**

- 7.1 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and the Data Protection Act 1998.

All such requests will be referred to the Director of Estates.

## **8.0 Access to images**

- 8.1 Access to images will be restricted to those staff that need to have access in accordance with the purposes of the system.

8.2 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following:

- Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and / or the prevention of terrorism and disorder.
- Prosecution agencies.
- Appropriate members of College staff (such as members of the Senior Leadership Team) in the course of staff or student disciplinary proceedings (including prospective proceedings) to ensure compliance with the College's regulations and policies.

## 9.0 Individual access rights

9.1 The Data Protection Act 1998 gives individuals the right to access personal information about themselves, including CCTV images.

9.2 All requests for access to a copy of CCTV footage by individuals should be made in writing to the Director of Estates using the College's Subject Access Request form. The Director of Estates will liaise with relevant staff to determine whether disclosure of the image will reveal third party information.

## 10.0 Subject access requests

10.1 Individuals whose information is recorded have a right to be provided with that information or, if they consent to it, view that information. Information must be provided promptly and within no longer than 40 calendar days of receiving a request. Providing information promptly is important, particularly where you may have a set retention period which will mean that the information will have been routinely deleted if you take the full 40 calendar days to respond. In such circumstances deletion of information may be put on hold.

10.2 A fee of up to £10 for this information may be charged. For any requests, you must provide the following details:

- a) The date and time the images were recorded
- b) Information to identify the individual, if necessary
- c) Proof of Identity

The College will respond promptly and at the latest within 40 calendar days of receiving the £10 request processing fee and sufficient information to identify the images requested.

If the College cannot comply with the request, the reasons will be documented. The requester will be advised of these reasons in writing, where possible.

10.3 Internal procedures for handling subject access requests are in place. These include keeping a log of the requests received and how they are dealt with. This is a compulsory requirement to ensure compliance with the Information Commissioner's CCTV Code of Practice 2014.

10.4 For full information on subject access requests please see the CCTV information commissioner 2014 section titled "Governance".

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

## 11.0 Freedom of Information

11.1 Requests for CCTV footage can be made under the Freedom of Information Act, subject to the exemptions in that legislation. For information on this act please see the section titled "freedom of information" in the CCTV commissioner's Code of Practice 2014.

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

## 12.0 CCTV Code of Practice 2014 and the Surveillance Camera Code of Practice 2014

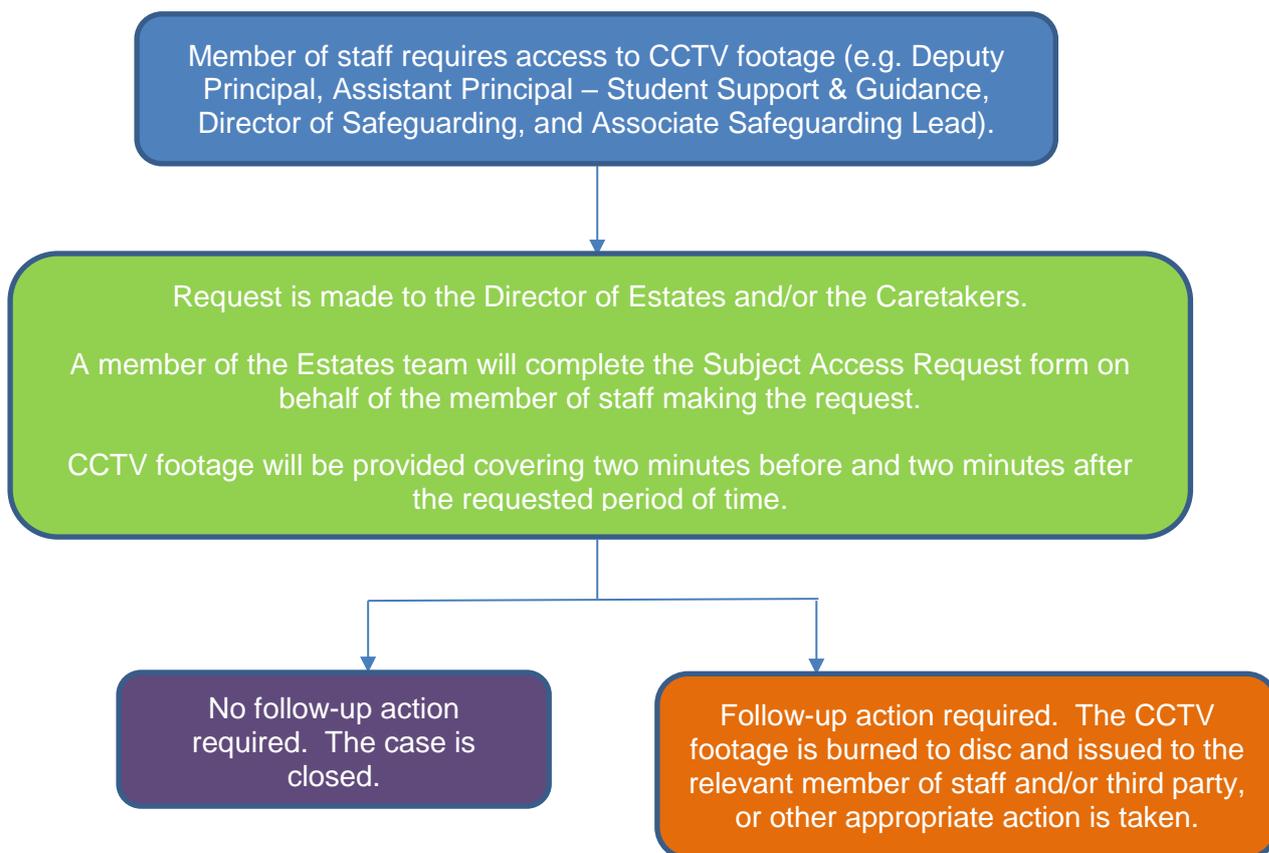
12.1 For full information regarding the Information Commissioner’s CCTV Code of Practice 2014 and the Surveillance Camera Code of Practice 2014 please click on the following links.

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

[https://www.gov.uk/government/uploads/system/uploads/attachment\\_data/file/204775/Surveillance\\_Camera\\_Code\\_of\\_Practice\\_WEB.pdf](https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/204775/Surveillance_Camera_Code_of_Practice_WEB.pdf)

## 13.0 Flow Chart of Internal Access to CCTV Footage

13.1 Key personnel in the College are likely to require access to CCTV footage from time to time. The procedure to be followed is set out below.



13.2 The Director of Estates will ensure members of the Estates team are fully aware of and compliant with this policy and that they are able to respond to requests for CCTV footage in a timely manner.

## 14.0 Review

14.1 This Policy will be reviewed annually.

Version	Date	Policy Owner	Comments	Approval Route and Date	Provenance	Date of Next Review	Equality Impact Assessment Completed (Y/N)
1	November 2015	Mark Hirst	New policy to reflect the College’s statutory obligations	SLT 16.12.15	-	November 2016	Y



# EQUALITY IMPACT ASSESSMENT



## INTRODUCTION

The purpose of carrying out an Equality Impact Assessment (EIA) is to provide the basis for creating equality objectives and performance indicators that will drive improvement and change in ensuring the College meets the needs of different groups of people with different protected characteristics, as defined in the Equality Act 2010.

### What is an impact assessment?

An EIA is a systematic and thorough consideration of how every aspect of the College's functions (i.e. policies, procedures, practices and plans) is affecting, or is likely to affect different people. EIAs should be reviewed a part of a rolling programme and the Action Plan updated accordingly.

It is good practice to carry out EIAs, although they are no longer mandatory. When conducting EIAs must explicitly consider impact on students, staff and other key groups in terms of race, disability, gender (including gender identity), sexuality, age, and religion and belief, and publish the results. Consultation with customers and potential customers, external clients, staff and students will be part of the EIA procedure and will also link to the Self-Assessment Report (SAR) and strategic plan for the College. The involvement of different stakeholders will evidence our commitment to embedding equality and diversity within all our services and the curriculum. The EIAs will be led and monitored by the Assistant Principal – Corporate Services.

### What needs to be impact assessed?

The EIA process will encompass all policies, procedures, practices and plans. When and where these are identified, each will need an EIA or review as part of a rolling programme, to determine whether they have a differential impact in relation to equality.

### Findings of EIAs

The findings of an EIA may provide a number of possible outcomes:

1. The EIA shows that employment practices or services have a different impact measured by one or more protected characteristic.
2. The EIA shows a different impact which is demonstrated to be adverse impact.
3. The EIA shows no differential impact in employment practices or service delivery.
4. There is insufficient evidence to judge whether there is differential impact.
5. The EIA indicates that there are needs that are not being met.

### Can I assess my own policies, procedures, practices and plans?

EIAs will usually be completed by the owner of the policy, procedure, practice and plan in conjunction with another colleague who is familiar with the process of conducting EIAs. The nominated person should not be involved with the design, maintenance or enforcement of the policy, plan, practice or procedure. This is to ensure that the EIA process is objective and robust, as a neutral party is more likely to highlight elements that will lead to positive change.

## Part One – The Impact Assessment

Date of last assessment (if applicable)	-
Date this assessment commenced	30 <sup>th</sup> November 2015
Name of policy/procedure/practice/plan being assessed	CCTV Policy
Name and job title of policy/procedure/practice/plan owner	Mark Hirst, Estates Director
Name(s) of independent colleague(s) appointed to contribute to the assessment	Sonia Ross Zoe Shackleton
Is this a new or existing policy/procedure/practice/plan?	New policy

### INITIAL SCREENING

<p><b>1. Please summarise the main aims of the policy/procedure/practice/plan. Include the intended benefits.</b></p>	<p>The CCTV Policy sets out the framework for the use of closed circuit television (CCTV), to provide a safe and secure environment for students, staff and visitors, and to protect College property.</p> <p>The policy refers to appropriate guidance and legislation and provides information on the recording of CCTV footage and requests for access to such footage.</p>
<p><b>2. What consultation has been undertaken in the development of the policy/procedure/practice/plan?</b></p>	<p>This is a new policy that takes account of current legislation and general good practice.</p> <p>The CCTV Policy has been discussed within the College's Senior Leadership Team, and approved via this route.</p>
<p><b>3. What evidence, data or information is available to indicate how the policy/procedure/practice/plan might affect equality?</b></p>	<p>There is no evidence, data or information available to indicate that the policy might adversely affect equality. CCTV cameras are positioned in various locations around the College and are not intended to single out any individual or group of people for the purpose of recording. The College is committed to providing a safe and healthy environment for its students and staff and the CCTV system is a valuable asset that is necessary to ensure that in the event of breaches of security, or other incidents that involve staff, students and/or visitors, there is a strong possibility of having reliable footage to inform any action that may need to be taken.</p>

<p><b>4. In what areas could the policy/procedure/practice/plan have a significant adverse differential impact?</b></p> <p>If you have selected one or more boxes for question 4, please go straight to question 5.</p>	<p><b>Disability</b>  <b>Race</b>  <b>Gender (including Gender Identity)</b>  <b>Sexual Orientation</b>  <b>Age</b>  <b>Religion or belief</b></p>	<p><input type="checkbox"/>  <input type="checkbox"/>  <input type="checkbox"/>  <input type="checkbox"/>  <input type="checkbox"/>  <input type="checkbox"/></p>
<p>If you have not selected any of the boxes for question 4 there is no need to complete the rest of this documentation. However, you must write the reasons why you believe there will be no differential impact, in respect of any of the protected characteristics listed, in the space opposite.</p>	<p>We are of the view that the CCTV Policy does not have a significant adverse differential impact on equality. The policy applies to staff, students and visitors and no discriminatory distinction is made.</p> <p>The policy ensures that there is a transparent procedure in place for the recording and possible sharing of recorded images, and that the College is compliant with all supporting legislation.</p>	

**ASSESSING IMPACT AND STRENGTHENING THE POLICY/PROCEDURE/PRACTICE/PLAN**

<p><b>5. What general concerns are there that the policy/procedure/practice/plan could have a differential impact on the protected characteristics you have indicated in question 4? Please give details.</b></p> <p>What relevant evidence is available to support these concerns? Please use data/statistics where possible.</p>	
<p><b>6. What are the risks associated with the effectiveness of the policy/procedure/practice/plan in relation to the differential impact?</b></p>	
<p><b>7. What are the expected benefits of the policy/procedure/practice/plan?</b></p>	

<p><b>8. Who are the 'interested parties' (i.e. adversely affected groups) in relation to this policy/procedure/practice/plan?</b></p>	
<p><b>9. How will these interested parties be consulted and communicated with?</b></p>	
<p><b>10. Which relevant experts and/or equality groups have been approached to explore the issues with which the policy/procedure/practice/plan is concerned?</b></p> <p><b>How have the views of these experts/groups been sought? (Please be as specific as possible, e.g. by letter, meetings, interviews, workshops, questionnaires, or any other method.)</b></p>	
<p><b>11. Please give details of the views of the experts/groups on the issues involved.</b></p>	
<p><b>12. Taking into account these views, and the available evidence, please outline the risks associated with the policy/procedure/practice/plan weighed against the benefits.</b></p>	

<p><b>13. What changes/modifications will now be made to the policy/procedure/practice/plan in the light of this Impact Assessment?</b></p>	
<p><b>14. How will these changes/modifications be communicated to interested parties (i.e. the groups which were adversely affected) and those consulted? (This should form part of the Action Plan.)</b></p>	
<p><b>Signed (completing officer 1)</b>  </p>	<p><b>Print Name and Job Title</b>  <b>Zoe Shackleton, Assistant Principal</b></p>
<p><b>Signed (completing officer 2)</b>  <b>Sonia Ross</b></p>	<p><b>Print Name and Job Title</b>  <b>Sonia Ross, Assistant Principal</b></p>
<p><b>Date of completion of Impact Assessment</b></p>	<p><b>10<sup>th</sup> December 2015</b></p>

**Actions arising from screening**

**(R = Race/Ethnicity, R&B – Religion and Belief, D – Disabled People, G – Gender (including gender identity), SO – Sexual Orientation, A – Age)**

R	R&B	D	G	SO	A	Action Required	By Whom	By When	Intended Outcome	Change resulting from EIA and date (include evidence if possible)