CCTV POLICY

1. Policy Statement

This policy seeks to ensure that the Closed-Circuit Television (CCTV) system used by PP Academy Ltd ("PPA") is operated in compliance with the law relating to Data Protection detailed in the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

PPA seeks to ensure, as far as reasonably practicable, the safety and security of all staff and all others that use PPA's locations covered by CCTV; and the security of its property and premises. PPA uses CCTV to:

- promote a safe environment and to monitor the safety and security of its locations
- support in the prevention, investigation and detection of crime
- support in the apprehension and prosecution of offenders.
- support in the investigation and breaches of its policies by staff and contractors.
- investigating complaints if required and appropriate
- support in the investigation of accidents.

This policy will be reviewed annually by the Chief Operating Officer ("COO"), to assure compliance with the above two paragraphs and to determine whether the use of the CCTV still justified.

PPA has carried out a legitimate interests assessment for operating CCTV in its locations.

2. Scope

This policy applies to CCTV systems at:

PP Academy Ltd
Unit 1, Deacon Field
Guildford
Surrey
GU2 8YT

This policy does not apply to other areas which are maintained by, and the responsibility of, the landlord or other tenants. This policy applies to all PPA staff, contractors, students and visitors.

3. Roles and Responsibilities

The COO is responsible for ensuring that the CCTV system, including camera specifications for new installations, complies with the law and best practice. They are responsible for the safety and security of the equipment and software utilised for the capture, recording and playback of live and historical CCTV images.

The COO is responsible for the evaluation of locations where live and historical CCTV images are available for viewing via the appropriate software. The list of locations and the list of people authorised to view CCTV images is maintained by the COO.

Changes in the use of PPA's CCTV system can be implemented only in consultation with PPA's Welfare Officer and Head of Faculty and Education.

4. System Overview

PPA operates cameras around the external perimeter of the site, including the car park area and also within the internal communal areas of the building.

The CCTV cameras continuously record activities in these areas.

CCTV cameras are not installed in areas in which individuals would have an expectation of privacy, such as toilets. Cameras are only located so that they capture images and live playback/video relevant to the purpose the system was set up for.

CCTV cameras are installed in such a way that they are not hidden from view. Signs are prominently displayed near the cameras, so that staff, students, visitors and contractors are made aware that they are entering an area covered by CCTV.

Recording is carried out 24 hours a day.

5. Equipment and Access

The recordings are taken and stored by Ubiquiti Security cameras in the main comms unit. CCTV footage is accessible using the appropriate software with access restricted to authorised users.

6. Retention and Disposal

CCTV recordings will not to be retained for longer than necessary, and deleted automatically after 30 days. If there is a legitimate reason for retaining the

CCTV images, for example during an accident investigation, the footage will be isolated and saved outside the CCTV system in a secure location with restricted access. Any saved images or footage will be deleted once no longer needed.

7. Data Subject Rights

Recorded footage, if sufficiently clear, is considered to be the personal data of the individuals whose images have been recorded by the CCTV system and as such fall in line with the PPA's Privacy Policy & GDPR standards.

However, other data subjects may be recorded so release of any recordings must first be approved by PPA's COO. It is rare for release to be approved due to the mixed nature of the data subjects.

8. Access to Recordings

CCTV recordings are available only to persons authorised by PPA to view them.

Authorised persons who access or monitor CCTV footage do so following the principals laid out in PPA's Data Protection policy, who as an affiliate of De Montfort University (DMU), PPA uses the DMU Data Protection Policy.

9. Third Party Access

All third-party access must first be approved by PPA. Such third parties must have their identity and authorisation checked, and a log recorded, including PPA's approval and reasons for approval.

Third party requests for access will usually only be considered, in line with the Data Protection legislation, in the following categories:

- From a legal representative of the data subject – a signed letter of authorisation from the data subject will be required and the request may be refused due to the mixed nature of the data subjects (see above)
- From law enforcement agencies, for example, the Police but only with a warrant or under Schedule 2 Part 1 Paragraph 2 (1) (b) of the Data Protection Act 2018. Namely the prevention or detection of crime and/or the apprehension or prosecution of offenders. It should be noted that the act does not give law enforcement the right to request the data, it just gives the company the ability to provide the data without having to be concerned about GDPR or to inform the data subject. Release of such data is optional.
- Disclosure required by law or made in connection with legal proceedings
- Staff responsible for disciplinary and complaints investigations

Where images are sought by other bodies/agencies with a statutory right to obtain information, such as the Police, evidence of that statutory authority, and legitimate reason, will be required before CCTV images are disclosed.

If third parties are included in the footage as well as the person who is the focus of the request, the same considerations will be made as in the case of subject access requests.

All requests and access of CCTV footage is logged.

10. Complaints procedure

Any complaints relating to the CCTV system should be directed in writing to the COO within seven days of the incident giving rise to the complaint. A complaint will be responded to within a month of the date of its receipt. Records of all complaints and any follow-up action will be logged.

Complaints relating to the release of footage should be directed in writing to the COO. These will be responded to promptly and, in any event, within 30 days of receipt. They will be dealt with in accordance with the provisions of the UK GDPR and the Data Protection Act 2018 (or any successor legislation).

Policy Updated: August 2024

Policy Review Due: September 2026