



## **CCTV Privacy Impact Assessment**

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## **Privacy Impact Assessment**

### **Introduction**

'Cheltenham College' refers to Cheltenham College Senior School *and* Cheltenham College Preparatory School (including Cheltenham College Pre-Prep and Nursery School)

'College' refers to Cheltenham College Senior School

'Cheltenham Prep' refers to Cheltenham College Preparatory School

'Nursery and Pre-Prep' refers to Cheltenham College Nursery School and Pre-Prep

This Privacy Impact Assessment documents how Cheltenham College complies with applicable data protection laws. The College is not a body that is required to have regard to the Surveillance Camera Code of Practice ('Code of Practice'), but it is referenced throughout the assessment as helpful guidance that may assist Cheltenham College to embed good practice. In particular Principle 2 of the Code of Practice states, that the use of a surveillance camera system must consider its effects on individuals and their privacy, with reviews of the system to ensure that its use remains justified.

Therefore, in keeping with the spirit of this Code of Practice, and data protection law, Cheltenham College seeks to ensure that privacy risks are minimised, whilst ensuring that the enhanced security and safety that CCTV affords is enabled and maximised for the benefits of Cheltenham College, its pupils, staff, visitors and the wider community.

Principle 2 determines the need for privacy impact assessment when CCTV is being developed and that the purpose of the system is assessed as being justified and remains so through a process of regular reviews. There should be consultation with those most affected and an assessment on the impact on privacy undertaken. The level of surveillance should be proportionate to the risk and not a disproportionate impact on privacy.

This Privacy Impact assessment seeks to ensure that Cheltenham College's approach to CCTV surveillance is in line with an individual's reasonable expectation to privacy.

The College Privacy Notice for Pupils, Parents, Guardians and Cheltonian Society members can be found on the following link;

<https://www.cheltenhamcollege.org/wp-content/uploads/2021/11/Privacy-Notice-for-Pupils-Parents-Guardians-and-Cheltonian-Society-Members-CC-2.pdf>

### **Storing and Managing CCTV Images**

Cheltenham College owns and operates a CCTV surveillance system which was first installed in the late 1990s, has since been added to and now operates around 260 cameras. Images are stored as data files.

Cheltenham College has a policy under which CCTV cameras and storage are managed in accordance with relevant legislation.

The CCTV Room is staffed 365 days a year. Staff who are required to monitor and download images have been trained to SIA Public Space Licence standards ensure the appropriate level of compliance with legislation for Public Space Cameras, CCTV data recording, monitoring, viewing and retrieval. Only those staff have access to the Security Control room. Staff or visitors to the control room are required to sign a visitor log and have appropriate reason in line with the CCTV policy to view any CCTV.

CCTV digital recordings from cameras are accessible from the CCTV Control Room, which is locked when not occupied. CCTV recording equipment is stored securely.

Recorded images are retained for 30 days, after which the storage is recorded over. Recorded images are not ordinarily downloaded for storage for a longer period unless for a specified purpose, for example to evidence an accident or incident on site or to support an investigation either internally or through external enforcement agencies. Where recordings are downloaded, this will be undertaken only where a formal request has been made to Cheltenham College.

### **Contact Details**

The day-to-day management of the CCTV surveillance system is delegated to;

Head of Security and Portering

Email: [security@cheltenhamcollege.org](mailto:security@cheltenhamcollege.org)

Tel: 01242 265600 (Switchboard)

## Cheltenham College Privacy Impact Assessment

<b>Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR) and Surveillance Camera Code of Practice 2013 (amended November 2021) (the latter for good practice only)</b>	
What is the organisation's purpose for using the surveillance cameras system and what are the issues that the system aims to address?	<p>College-wide CCTV system to provide an added layer of safety and security for pupils, staff and visitors to College.</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> Enhancing the health and safety of pupils, staff and visitors;</li> <li><input type="checkbox"/> Supporting safeguarding of pupils and visiting pupils</li> <li><input type="checkbox"/> Preventing bullying;</li> <li><input type="checkbox"/> Reducing the incidence of crime and anti-social behaviour (including theft and vandalism);</li> <li><input type="checkbox"/> Protecting Cheltenham College, its buildings, assets, finances, and reputation;</li> <li><input type="checkbox"/> Supporting the Police to deter and detect crime;</li> <li><input type="checkbox"/> Assisting in identifying, apprehending, and prosecuting offenders;</li> <li><input type="checkbox"/> Ensuring that the school rules are respected so that the school can be properly managed; and</li> <li><input type="checkbox"/> Monitoring safety on crossing points on roads surrounding the College</li> </ul>
Can surveillance camera technology realistically deliver these benefits?	<p>CCTV enables monitoring and evidence of trespassers onto the College site, to identify any occurrences of a safety risk to pupils and staff, or of a safeguarding risk to pupils. CCTV has provided evidence of, for example</p> <ul style="list-style-type: none"> <li><input type="checkbox"/> attempts to steal from cars in boarding houses or to steal bikes,</li> <li><input type="checkbox"/> young people on site climbing onto the roofs of Cheltenham College buildings</li> <li><input type="checkbox"/> trespassers seeking to access Cheltenham College property, and</li> <li><input type="checkbox"/> maintenance working and other contracts not being carried out to the required standard or which raises a safety risk</li> </ul>

What are the views of those who will be under surveillance?	Advice sought from Gloucestershire Highways in 2017 regarding installation of the cameras on the crossing points at Thirlestaine Road and Sandford Road. Other than slight overlaps onto public/private land all other cameras are focused on Cheltenham College site only therefore internal communication with staff.
Have other less privacy intrusive solutions such as improved lighting been considered?	Cheltenham College operates in a conservation area and where possible there have been improvements in physical barriers and illumination. CCTV cameras provide an added layer of safety, security and safeguarding and provides reassurance. As Cheltenham College is a 24/7 entity that operates 365 days a year, the CCTV system will operate continuously throughout the year.
What are the benefits to be gained from using surveillance cameras?	Provides examples and evidence of security threats to Cheltenham College, supports Cheltenham College's approach to improving pupil safety particularly in respect of road safety and provides reassurance.
What are the privacy issues arising from the surveillance system?	Cheltenham College policy is to not infringe upon an individual's reasonable expectation to privacy. Images obtained from CCTV may help to; <ul style="list-style-type: none"> <li><input type="checkbox"/> support an accident investigation</li> <li><input type="checkbox"/> identify and manage safety or security risks</li> <li><input type="checkbox"/> provide Police or other agencies with evidence for their investigations, and</li> <li><input type="checkbox"/> introduce corrective and preventative measures in the light of evidence obtained from the CCTV.</li> </ul>
Have any privacy by design features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements?	Cameras are overt and located so as not to overlook private property that meets with the Cheltenham College boundary and where this is not entirely possible that any overlap of camera coverage from Cheltenham College land onto neighbours is minimised.

	<p>Images are automatically deleted after 30 days unless legitimate concerns are raised, it is not used to regularly monitor work undertaken by College employees or contractors.</p> <p>Images are securely stored and access is only provided for approved members of staff or to those who have a justifiable interest in the matter.</p> <p>Those managing the cameras are Security Industry Authority licenced and receive training covering the College's data protection obligations with respect to CCTV footage.</p>
<p>What organisations will be using the CCTV images and where is data controller responsibility under the Data Protection Act 2018 and the UK General Data Protection Regulation?</p>	<p>Camera monitoring and recording is specified and designed for Cheltenham College use only and the College will be acting as a controller in this regard. The Cheltenham College CCTV policy has a facility for third parties, e.g. enforcement agencies, other bodies, and organisations and individuals, to make a request to view/obtain images for legitimate reasons, e.g. to support a justifiable investigation. Each request will be considered on its merits and in line with applicable data protection law and relevant College policies.</p> <p>Where a third party processes the College's CCTV footage for its own (internal) purposes that third party will be considered a controller with respect to that processing. In this situation the third party will be responsible for processing the footage in line with its own data protection obligations and individuals should address any concerns with that processing to the third party. The College will provide reasonable assistance to the third party if requested or required.</p>
<p>Do the images need to be able to identify individuals or could the scheme use other images not capable of identifying individuals?</p>	<p>There will be instances where individuals must be identified for the CCTV footage to be effectively used for the purposes set out above. For example the images may be used to correct the behaviour of pupils and groups of pupils for safeguarding reasons.</p>

	<p>Similarly, where there is a potential external threat to Cheltenham College then being able to identify an individual will be important and necessary to achieve its intended purposes.</p> <p>The College will not process CCTV footage that can identify individuals when their identification is not necessary.</p>
<p>Will the surveillance camera equipment being installed, and the system of work being adopted be sustainable? Is there sufficient money for the scheme?</p>	<p>Funding for the scheme is sustainable, Cheltenham College owns all its cameras and there are no broadcast or storage charges. There are no dedicated staffing costs associated with CCTV in Cheltenham College.</p>
<p>Will the system/equipment being considered deliver the desired benefit now and in the future?</p>	<p>CCTV system meets Cheltenham College's current organisational needs and does so daily. This is kept under regular review. Cheltenham College operates a large and dispersed site and an organic process of increasing and improving CCTV coverage across the site is progressing.</p> <p>Changes to the external environment, internal risks and changes in technology would also be drivers for adjusting the system in the future.</p>
<p>What future demands may arise from wider use of images and how will these be addressed?</p>	<p>No plans at present.</p>

## Privacy Impact Assessment Level 2

Principle 2 of the Surveillance Camera Code of Practice states that 'The use of a surveillance camera system must consider its effect on individuals and their privacy, with regular reviews to ensure its use remains justified'. The Cheltenham College inventory of cameras is as follows;

ID	Camera Type	Makes and Models	Number	Description	Justification and Expected Use
1	Standard Static	HIK Vision DS-2CD	Up to 255	Static, no movement or zoom function	24-hour operation, monitored and recorded
2	Pan Tilt Zoom (PTZ) Camera	HIK Vision DS-2DE	Up to 5	Pan Tilt Zoom	24-hour operation, monitored and recorded

<b>Location Assessment of Interior Cameras</b>	<b>Camera Type and number</b>	<b>Recording</b>	<b>Monitoring</b>	<b>Assessment of Use and Mitigations</b>
Main College Reception	1 x Static	24 Hours	Monitored in between patrols	CCTV Policy
Library	2 x Static	24 Hours		CCTV Policy
Ann Cadbury Room	1 x Static	24 Hours		CCTV Policy
Geography Staircase (bagdrop)	1 x Static	24 Hours		CCTV Policy
Glass Door lobby by Big C Bag Drop	1 x Static	24 Hours		CCTV Policy
Corridor (Exams Office)	1 x Static	24 Hours		CCTV Policy
ICT Office	1 x Static	24 Hours		CCTV Policy
ICT Corridor	1 x Static	24 Hours		CCTV Policy
ICT Server Room	1 x Static	24 Hours		CCTV Policy
Big C	1 x Static	24 Hours		CCTV Policy
Deputy Heads Corridor	1 x Static	24 Hours		CCTV Policy
Valens	2 x Static	24 Hours		CCTV Policy
Head of LC Lobby	1 x Static	24 Hours		CCTV Policy
Dining Room	2 x Static	24 hours		CCTV Policy
Servery	2 x Static	24 Hours		CCTV Policy
College Coffee	1 x Static	24 Hours		CCTV Policy
Chapel - Narthex	1 x Static	24 Hours		CCTV Policy
Thirlestaine Long Gallery	1 x Static	24 Hours		CCTV Policy
Thirlestaine MFL/Music Stairs	1 x Static	24 Hours		CCTV Policy
Prep Reception	1 x Static	24 Hours		CCTV Policy
Prep Hall	1 x Static	24 Hours		CCTV Policy
Prep Boarders Staircase	2 x Static	24 Hours		CCTV Policy
Prep Day End	2 x Static	24 Hours		CCTV Policy
Prep Barn	1 x Static	24 Hours		CCTV Policy
Nursery School	3 x Static	24 Hours		CCTV Policy
CCF Internal	3 x Static	24 Hours		CCTV Policy
Sports Centre Reception	1 x Static	24 Hours		CCTV Policy
Swimming Pool	1 x Static	24 Hours		CCTV Policy
Balcony Gym	2 x Static	24 Hours		CCTV Policy
Lower Gym	1 x Static	24 Hours		CCTV Policy
Performance Gym	1 x Static	24 Hours		CCTV Policy
Estates Supplies Room	1 x Static	24 Hours		CCTV Policy

Warehouse	2 x Static	24 Hours	CCTV Policy
Ashmead House Porch	1 x Static	24 Hours	
Chandos House/Cottages Reception	2 x Static	24 Hours	
Hazelwell Boys entrance	1 x Static	24 Hours	
Southwood	2 x Static	24 Hours	
Westal House Porch	1 x Static	24 Hours	
Boyne Boys Entrance	1 x Static	24 Hours	
Leconfield Boys Entrance	1 x Static	24 Hours	
Newick Boys Entrance	1 x Static	24 Hours	
Newick Private Front Door	1 x Static	24 Hours	
Christowe Boys Entrance	1 x Static	24 Hours	
Christowe Private Front Door	1 x Static	24 Hours	
College Lawn Girls Entrance	1 x Static	24 Hours	CCTV Policy
Senior Science Lobby	2 x Static	24 Hours	
Senior Science Biology	1 x Static	24 Hours	
Dewerstone House	2 x static	24 Hours	

Location Assessment of Exterior Cameras	Camera Type and Number	Recording	Monitoring	Assessment of Use and Mitigations
Main Building	5 x Static	24 Hours	CCTV Policy	
Accounts Lodge	1 x Static	24 Hours		
Quad	4 x Static	24 Hours		
Centenary Building	1 x Static	24 Hours		
Restaurant block	1 x Static	24 Hours		
Chapel	2 x Static	24 Hours		
Chapel Driveway	2 x Static	24 Hours		
Chandos Gate Thirlestaine Rd	1 x Static	24 Hours		
Chapel Gate Sandford Road	1 x Static	24 Hours		
Thirlestaine House	3 x Static	24 Hours		

XT Gate – College Field	1 x Static	24 Hours	Monitored In between patrols	CCTV Policy
Prep School	24 x Static	24 Hours		CCTV Policy
Nursery School	7 x Static	24 Hours		CCTV Policy
Prep School Car Park	1 x PTZ	24 Hours		CCTV Policy
Waterfield Close	1 x Static	24 Hours		CCTV Policy
CCF	4 x Static	24 hours		CCTV Policy
HR	1 x Static	24 Hours		CCTV Policy
Science Block	2 x Static	24 Hours		CCTV Policy
Sports Centre	8 x Static	24 Hours		CCTV Policy
Pavilion	4 x Static	24 Hours		CCTV Policy
College Field	1 x PTZ	24 Hours		CCTV Policy
College Field/DT	3 x Static	24 Hours		CCTV Policy
Wilson Block	3 x Static	24 Hours		CCTV Policy
Estates	4 x Static	24 Hours		CCTV Policy
Karenza Yard	1 x PTZ	24 Hours		CCTV Policy
Karenza Building	4 x Static	24 Hours		CCTV Policy
Boathouse Tewkesbury	5 x Static	24 Hours		CCTV Policy
Boathouse PTZ	1 x PTZ	24 Hours		CCTV Policy
Warehouse	1 x Static	24 Hours		CCTV Policy
Dewerstone House	5 x Static	24 Hours		CCTV Policy
Ashmead House	5 x Static	24 Hours		CCTV Policy
Boyne House	5 x Static	24 Hours		CCTV Policy
Chandos House & Cottages	10 x Static	24 Hours		CCTV Policy
Christowe House	6 x Static	24 Hours		CCTV Policy
College Lawn	15 x Static	24 Hours		CCTV Policy
Hazelwell House	6 x Static	24 Hours		CCTV Policy

Leconfield House	6 x Static	24 Hours	CCTV Policy
Newick House	7 x Static	24 Hours	
Queens House	4 x Static	24 Hours	
Southwood House	4 x Static	24 Hours	
Westal House	12 x Static	24 Hours	