

Policy: Closed-Circuit Television (CCTV)

Author	Premise Manager
Date last reviewed	June 2025
Approval route	College Leadership Team
Date Approved	10 th September 2025
Review cycle	Annually
Date Review Due	September 2026
Contractual or Non-Contractual	Contractual / Website
Location of copies	College SharePoint
Policy version	1

1. Introduction

Franklin Sixth Form College is committed to transparency, accountability, and openness in its operations. This Closed-Circuit Television (CCTV) Policy sets out how we will comply with the Data Protection Act and UK GDPR in relation to CCTV. Franklin Sixth Form College is a provider, who is responsible for the collection and processing of your personal data, as defined by data protection laws. The College is the data controller and/or processor for personal data relating to you.

2. Purpose of the Policy

The purpose of this policy is to:

- Ensure that the College complies with the requirements of the Data Protection Act and UK GDPR in relation to CCTV.
- Provide staff, students, and third parties with clear guidance.
- Promote a culture of openness and transparency within the College.
- Clarify the responsibilities of staff.

3. Scope of the Policy

This policy applies to the following individuals to follow:

- **Staff:** All employees, Governors, contractors, and volunteers working for the College.
- **Students:** Individuals enrolled at the College, including those on full-time and part-time programmes.
- **Third Parties:** External individuals or organisations making requests from the College.

This policy covers all information held by the College in relation to CCTV.

4. What information do we hold about you?

- We carry out CCTV recording across the College's sites. The College is registered with the Information Commissioner's Office (ICO) for this purpose.
- CCTV covers some interiors and exteriors of buildings. If you attend, visit or work at Franklin Sixth Form College we may record moving images of you as you enter and move about the College.

5. Why do we collect this information?

- We have installed CCTV and make recordings to enable us to keep students, staff and visitors safe protecting the Colleges buildings and assets, both during and after College hours and to help investigate and / or provide evidence from health and safety incidents, to aid crime prevention and detection and any equivalent malpractice.
- The CCTV system is owned and operated by the College, the deployment of which is determined by the Colleges Leadership Team.

6. Who might we share your information with?

- We aim to keep this information about you confidential.
- We may be asked to share data with other third parties where there is a lawful reason for their request. These may include: the police, social services, legal firms acting on you're or the College's behalf, insurance companies, or other government or regulatory agencies.

7. Privacy Notices

Our privacy notices which are available on our website state the following:

CCTV

CCTV recordings are used and retained for a limited period to ensure the safety of student applicants, students, parents/guardians, staff and visitors to the College. Access to view and monitor these recordings is limited to the appropriate staff who will report and act accordingly if suspicious or inappropriate actions or behaviours are identified. CCTV images may be passed on to the police for the purposes of crime detection or prevention and Franklin Sixth Form College will also disclose CCTV footage when requested by insurance companies. CCTV may be used to assure the integrity of our examination arrangements, with footage shared with Awarding Organisations for audit and fraud prevention purposes.

8. What do we do with your information?

- We collect this information which is held on the CCTV system for the safety and security of those who are on the College premises.
- The CCTV may be viewed by authorised staff and in the event of an accident or other incident may be viewed by other members of staff at the College.

9. How do we protect your data?

- We take the security of your data seriously and have controls in place to try to ensure that your data is not lost, accidentally destroyed, misused or disclosed inappropriately.
- Where we engage third parties to process personal data on our behalf, we do so on the basis of written instructions, are under a duty of confidentiality and are obliged to implement appropriate technical and organisational measures to ensure the security of data.

10. How long do we keep this information about you?

- We keep information recorded on CCTV for 60 days, where the IT system can accommodate the volume of data stored, after which it is deleted. Where recordings are requested or required to provide evidence of incidents, the relevant section of recording will be downloaded and stored by the College. These recordings will be kept in line with the College's Data Retention policy.

11. Your Rights

Under data protection law, you have the following rights regarding your data:

- **Access:** You have the right to request access to the personal data we hold about you in certain circumstances.
- **Rectification:** You have the right to request that we correct any inaccurate or incomplete data in certain circumstances.
- **Erasure:** You have the right to request the deletion of your personal data in certain circumstances.
- **Restriction:** You have the right to request that we restrict the processing of your personal data in certain circumstances.
- **Data Portability:** You have the right to request that we transfer your personal data to another organisation.

- **Objection:** You have the right to object to certain types of processing of your data in certain circumstances for example if it is likely to cause, or is causing, damage or distress.
- **Withdrawal of Consent:** If we process your data based on your consent, you have the right to withdraw that consent at any time in certain circumstances.

You also have the right to:

- Object to processing of personal data that is likely to cause, or is causing, damage or distress
- Prevent processing for the purpose of direct marketing
- Object to decisions being taken by automated means
- In certain circumstance, have inaccurate personal data rectified, blocked, erased or destroyed

To exercise any of these rights, please contact the College's Data Protection Officer (DPO).

Right to request access to your information

- Under data protection legislation individuals have the right to request access to information about them that the College holds. The rights of other individuals will always be considered. The right will be considered and whether it is appropriate to provide you with the information. To make a request for this, please email information.governance@franklin.ac.uk who will process the request in partnership with Franklin Sixth Form College's Data Protection Officer.
- If you have any queries or concerns which are not answered by this policy, other data protection related policies or privacy notices about the way we are collecting or using your personal data, we request that you raise your concern with us in the first instance to information.governance@franklin.ac.uk. Alternatively, you can contact the Information Commissioner's Office at <https://ico.org.uk/make-a-complaint>

12. What we may need from you

- We may need to request specific information from you to help us confirm your identity and ensure your right to access your personal data (or to exercise any of your other rights). This is a security measure to ensure that personal data is not disclosed to any person who has no right to receive it. We may also contact you to ask you for further information in relation to your request to speed up our response.

13. Training and Awareness

- To ensure compliance, the College will provide training to staff on their responsibilities under this policy directed by the Premises Manager.

14. Policy Review

- This policy will be reviewed by the Premises Manager and College Leadership Team to ensure it remains up to date and effective. Any necessary amendments will be made in consultation with relevant parties. This is to make sure that we continue to meet the highest standards and to protect your privacy. We always reserve the right, to update, modify or amend this policy. We suggest that you review this policy from time to time to ensure you are aware of any changes we may have made, however, we will not significantly change how we use information you have already given to us without your prior agreement. The latest version of this policy can be found on the College's website.

15. Contact Information

- For further information or assistance regarding CCTV, please contact the Premises Manager:
Telephone: [01472 875 000]. Postal Address: [Premises Manager, Franklin College,
Chelmsford Avenue, Grimsby, DN34 5BY]