



Closed Circuit Television Policy

Document Type	Policy
Administering Entity	Chief Operating Officer, Facilities Management Staff
Latest Approval/ Amendment Date	26/04/2023
Last Approval/ Amendment Date	New Policy
Approval Authority	Board of Directors

1. Introduction

- a. The SP Jain London School of Management (the School) is committed to providing a safe and secure learning environment on its campus. The use of Closed Circuit Television (CCTV) across the main School site is part of the School's efforts to ensure the safety and security of its members and visitors, as well as safeguarding property.

2. Scope and relation to other policies

- a. This policy covers the CCTV that operates on the SP Jain London School of Management Campus. Please note the CCTV in operation in the wider Harbour Exchange buildings is operated by the Landlord and is not the responsibility of the School.
- b. The School's use of CCTV is covered by the General Data Protection Regulation (GDPR). Identifiable imagery is considered as personal data under the GDPR and, therefore, this policy is committed to the protection of individuals' rights and privacy. The processing of personal data such as the collection, recording, use, and storage of personal information through the CCTV system will be dealt with lawfully and correctly in accordance with the School's Data Protection Policy.

3. Purposes of the CCTV system

- a. The CCTV system has been installed by the School for the following purposes:
 - b. To help ensure the safety of Staff and students
 - c. To reduce the fear of crime and reassure staff and students
 - d. To monitor the security of premises
 - e. Assist in deterring, investigating and detecting crime or reports of possible crime;
 - f. Support the investigation of safety and security-related incidents and suspected misconduct by staff, students or visitors;
 - g. To aid the identification, apprehension and prosecution of offenders or suspected offenders (including the potential use of images in criminal proceedings)

4. Legal basis under GDPR

- a. The School considers that it is its legitimate interests to promote a safe and secure environment and to use CCTV for this purpose.

5. Responsibility for the CCTV system

- a. The School Officer with overall responsibility for the CCTV system is the Chief Operating Officer acting as the School's Data Protection Officer.

6. The CCTV system

- a. The system covers the entirety of the School campus. It is operated 24 hours a day throughout the year. All cameras are fixed position and although some may have an audio recording function this will always be disabled. The system does not support a facial recognition facility, but meets the D1 resolution standard (720 X 480 pixels). School members and visitors are made aware of the CCTV system by appropriate signage at the entrances to the School campus.
- b. The School CCTV will not be used for intrusive or directed surveillance. Areas such as toilets and sleeping accommodation will not be monitored.

7. Recordings and storage

- a. Images are retained for 30 days and then overwritten.
- b. Access to recorded images is limited to the Chief Operating Officer, staff responsible for security and the contracted supplier.
- c. At the end of their useful life all images on discs will be erased and securely disposed of as confidential waste. All images will be deleted from School servers and all still photographs and hard copy prints will be securely disposed of in confidential waste.

8. Disclosure of CCTV

- a. Requests to access the data must be made to the Chief Operating Officer. Disclosures will only be made, for example with the police or law enforcement agencies, where it considers that this is reasonably necessary for the purposes and objectives set out in paragraph xx of this policy.
- b. CCTV footage may also be used as part of an HR or student disciplinary investigation. In this event, only those who are part of the investigation will be given access to the CCTV images. The decision to release CCTV for this purpose rests with the Data Protection Officer.
- c. Requests for access to the CCTV images may also come from data subjects, i.e. those featuring in the CCTV images. Any such requests should be directed to the Data Protection Officer.

9. Complaints and contacts

- a. Any individual having concerns about the CCTV system are requested to contact the Chief Operating Officer in the first instance.