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MONT ROSE®
COLLEGE

CCTV Privacy Policy

2026 - 2027

Approved by: Academic/Quality Assurance Board

Date of approval: 19/02/2026

Effective date: 19/02/2026

Next review date: 31/03/2027

1. Introduction

1.1 Mont Rose College of Management and Sciences Limited (“the College”) operates Closed-Circuit Television (CCTV) systems across its premises to maintain a safe and secure environment for students, staff, visitors, and contractors.

1.2 This policy explains:

- Why CCTV is used
- Where it operates
- How footage is processed and protected
- Individuals’ rights
- How the College complies with UK data protection law

The College processes CCTV footage in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

2. Purpose of CCTV Monitoring

2.1 CCTV is used for the following legitimate purposes:

- Protecting the health, safety, and welfare of students, staff, and visitors
- Preventing and detecting crime and anti-social behaviour
- Protecting College property and assets
- Assisting in the investigation of incidents and disciplinary matters
- Supporting law enforcement where appropriate

2.2 CCTV will not be used for routine monitoring of staff performance or student attendance unless there is a lawful and specific reason to do so.

3. Lawful Basis for Processing

Under Article 6 UK GDPR, the College relies on:

- Legitimate Interests – Maintaining campus safety and security
- Legal Obligation – Compliance with health and safety and safeguarding laws
- Vital Interests – Where necessary to protect life

A Legitimate Interests Assessment (LIA) has been conducted to ensure CCTV use is proportionate and necessary.

4. Scope and Locations

4.1 CCTV operates in selected areas of College premises, including:

- Entrances and exits
- Reception areas
- Corridors and communal areas
- Car parks
- External building perimeters
- Student common areas

4.2 CCTV is not installed in areas where individuals would reasonably expect privacy, such as:

- Toilets
- Prayer rooms
- Private offices (unless subject to specific risk assessment)

4.3 Clear signage is displayed at entrances and throughout monitored areas informing individuals that CCTV recording is in operation.

5. What Information Is Collected

5.1 CCTV systems capture:

- Video images
- Date and time of recording

5.2 Audio recording is not used unless expressly authorised, legally justified, and clearly communicated.

6. Access to CCTV Footage

6.1 Access to CCTV footage is strictly controlled and limited to authorised personnel, including:

- Designated security staff
- Senior management where necessary
- IT support staff for maintenance purposes
- The Data Protection Officer

6.2 Access is role-based and logged. Unauthorised access or misuse may result in disciplinary action.

7. Disclosure of Footage

Footage may be disclosed:

- To the police or law enforcement agencies where required for the prevention or detection of crime
- To insurers or legal representatives in connection with claims
- In response to lawful court orders
- Where required by safeguarding obligations

The College will not share footage for commercial or marketing purposes.

8. Retention of Footage

8.1 CCTV footage is retained for a maximum of 45 days unless:

- Required for an ongoing investigation
- Subject to a formal complaint or disciplinary matter
- Required for legal proceedings

8.2 After the retention period, footage is automatically deleted or overwritten securely.

8.3 Retention periods are reviewed periodically to ensure they remain proportionate.

9. Data Security

9.1 The College implements appropriate technical and organisational security measures, including:

- Secure, password-protected systems
- Restricted access controls
- Encrypted storage where feasible
- Physical security of recording equipment
- Audit logs of access and disclosures

10. Data Subject Rights

10.1 Under UK GDPR, individuals have the right to:

- Request access to their personal data (Subject Access Request)
- Request erasure (where applicable)
- Request restriction of processing
- Object to processing data

- Lodge a complaint with the Information Commissioner's Office (ICO)

10.2 Requests should be submitted in writing to:

Data Protection Officer

Mont Rose College of Management and Sciences Limited

412-416 Eastern Avenue

London

IG2 6NQ

Email: dpo@mrcollege.ac.uk

The College may:

- Require proof of identity
- Redact third-party images
- Refuse requests where exemptions apply under the Data Protection Act 2018

11. Subject Access Requests (SARs)

11.1 Individuals wishing to access CCTV images of themselves must:

- Specify the date, time, and location of the footage
- Provide sufficient information to identify themselves

11.2 The College will respond within one calendar month, in accordance with UK GDPR requirements.

12. Surveillance Camera Code of Practice

12.1 The College has regard to the principles of the Surveillance Camera Code of Practice, including:

- Use being necessary and proportionate
- Clear accountability and governance
- Transparency
- Regular review of necessity

13. Monitoring and Review

13.1 The CCTV system and this policy are reviewed annually to ensure:

- Continued necessity and proportionality
- Compliance with legal requirements
- Effectiveness in achieving stated purposes

14. Complaints

14.1 If you have concerns about the College's use of CCTV, you may:

- Contact the Data Protection Officer in the first instance at dpo@mrcollege.ac.uk
- Lodge a complaint with the Information Commissioner's Office (ICO):

www.ico.org.uk

15. Policy Status

This policy forms part of the College's Data Protection Framework and should be read alongside:

- Data Protection Policy
- Privacy Policy
- Safeguarding Policy