

College Group Policy

Security and CCTV Operation

Manager Responsible: Director of Learning Experience & Progression

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AMENDMENT SUMMARY

<u>Version</u>	<u>Date</u>	<u>Remarks</u>
2.0.1	01 Jan 2017	Periodic Review
2.0	22 Feb 2017	Publication and Distribution
3.0.1	10 Sep 2018	Periodic Review
3.0.2	12 Feb 2019	Update of CCTV sections to ensure GDPR Compliance; revision to points 23 and 30
3.03	30 Sept 2021	Reviewed, author email address change, update of camera numbers
3.04	13 Sept 2022	New appointment signature Alison Davies
3.05	10 Oct 2022	Updated reception greeting areas for Dovedale Nursery and changed signatures
4.00	17 Feb 2023	Reviewed – New Construction block CCTV added to total for PR. New Access Control for rear of MS main block. Added section on procedure for out of hours incidents

Age, Disability, Gender & Race Equality Statement

Age, Disability, Gender and Race Equality Impact Measures will be set and monitored through analysis of all data related to potential suspected or actual abuse of this policy.

A copy of the Equality Impact Assessment Initial Screening Form is attached as an Annex to this document

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Statement of Intent

1. Chelmsford College considers violence towards employees and the risk of violence to be a serious matter. The College recognises that the potential for violence to occur at work is a significant hazard in occupations where an employee comes into contact with members of the public. The College undertakes to be fully supportive of staff, students and visitors who have been subject to violence and to take positive action to minimise potential risks.
2. Chelmsford College has a general duty under section 2 of the Health and Safety at Work etc. Act 1974 (HSW Act) to ensure as far as is reasonably practicable, the health, safety and welfare at work of all their employees. This duty is wide in scope and extends to the protection of staff against violent incidents where these are foreseeable. Section 2 implies that an employer should consider not only the threat of actual injury but also the potential effects on employees' physical and mental health or welfare, for example if subjected to continuous verbal abuse.
3. Section 2(3) of the HSW Act requires employers to prepare a written health and safety policy statement. This will include the organisation and arrangements for dealing with foreseeable risks of violence to staff. When incident-reporting procedures and a preventative strategy have been discussed, devised and agreed by the College and employees or their representatives, these will be incorporated into the safety policy.

The Education and Safety Advisory Committee's working definition of violence is as follows:

"Any incident in which an employee is abused, threatened or assaulted by a student, pupil or a member of the public in circumstances arising out of the course of his or her employment".

4. Violence at work is defined as not only physical attacks, but also verbal abuse and threatening behaviour. Threats and verbal abuse, which are sometimes disregarded as forms of violence, are important because of their potential to escalate, and because of the serious effects that prolonged exposure can have on staff morale and efficiency.
5. Employers also have HSW Act responsibilities to people working at their premises who are not their employees; e.g. contract cleaning staff. In these circumstances, the College will liaise with the employer of the contract staff to discuss how both can best deal with risks of violence to their staff, reporting procedures for incidents, etc.
6. Heads of Business Support units and Curriculum Area Managers and Heads of Department are required to carry out a risk assessment within their areas of responsibility to assess the potential risks of violence in the workplace. This assessment may include a survey of staff within the area to identify where potential problems may lie.

Reporting and Recording Incidents

7. Staff are positively encouraged to report incidents, using the standard college Report Form (Appendix A). Such information is recorded in the College's Accident-Incident database and statistics reported to the Health & Safety Committee Meeting held every term. Reports are used to assess potential risks and to develop and monitor appropriate preventive strategies. Such reports should not be considered a reflection of an individual's ability to do a particular job or a teacher's professional ability to manage classes, rather as a helpful tool to ensure a continued safe working environment. All incidents should be reported as soon as possible, but certainly within 24 hours. Senior members of staff can complete forms on behalf of employees who are unable to do so.
8. Staff should complete the form and forward it to Human Resources (if appropriate), the Health and Safety Officer, and their line manager. The Health and Safety Officer will be required to report to the Health and Safety Committee on incidents and the development of preventative strategies and to monitor the effectiveness of such strategies. The Health and Safety Officer will also report intentional violent incidents arising from work to the HSE as required by the Reporting of Injuries, Diseases and Dangerous Occurrences Regulations 1985 (RIDDOR).
9. The Director of Learning Experience & Progression will assess the need for disciplinary action where students are involved with reference to the Student Disciplinary Code.

Work Practices and Patterns

10. It must be emphasised that employees are not expected to subject themselves to unnecessary risks and are not expected to cope alone with potentially violent situations. They should seek the support of fellow colleagues and/or Senior Staff where necessary.
11. Particular activities or jobs within an organisation can create potential for violence. Sometimes specific activities can be altered so that they are carried out in ways which lessen those risks. Where activities or jobs cannot be altered or adapted, specific precautions and training may be appropriate to help reduce risks. Panic buttons and personal alarms may be needed, i.e. reception, learning centres and interview rooms, particularly during College closure periods and where highlighted by risk assessment.

Examples of How to Deal with Aggression

12. When angry parents or other visitors arrive at college premises, some procedures can help to diffuse a difficult situation and avoid violent confrontation.
Examples are:
 - a. Avoid confrontation in front of an audience, particularly groups of students. The fewer people that are involved in an incident, the easier it is for the aggressor to back down without losing face;
 - b. Ask another preferably senior member of staff to help talk things through with the visitor;
 - c. Stay calm, speak slowly and politely so as not to be drawn into heated argument- this makes it more difficult for others to over-react;
 - d. Avoid aggressive body language such as hands on hips, wagging fingers, looking down on the aggressor;
 - e. Never over-react when confronted with aggression or verbal abuse, always talk calmly and with a low tone; do not ignore the person. Keep at arm's length so as not to invade a person's private space;
 - f. If a person's violence is directed towards the furniture or fixtures in the area, unless there are sufficient staff available, do not intercede (furniture can be replaced). In this situation retire to a safe area until assistance arrives.
 - g. Carry a personal alarm, if you are a lone worker.

Separating Fighting Students

13. Staff must not place their own and other students' safety in jeopardy; where necessary Senior Staff will call the police. Many violent incidents towards staff in educational premises stem from attempts to separate fighting students; staff are advised to seek the support of fellow colleagues, when attempting to separate fighting students.
14. It is in the interest of all employees to strive for 'safe outcomes' (from staff-public interactions) and to prevent violent behaviour wherever possible. It follows that if violence does occur, employees involved or witnessing violence must take appropriate action to contain the incident and to avoid the risk of any unnecessary injury to any party.

Staff Training

15. Training will be made available to all staff identified by risk assessments, as being at risk from violence in the workplace. Training will be geared towards groups of staff, the risks they face and their particular needs, and with reference to Staff development and appraisal needs. Training might include:
 - a. Causes of violent and aggressive behaviour
 - b. Familiarisation with the College's policy and strategy
 - c. Communication/inter-personal skills
 - d. Techniques for preventing and avoiding violence, calming aggression
 - e. Assertiveness training; advice on techniques for breaking away from aggressive persons

Pooling of Information

16. Some clients or relations of clients of the College will be known from previous experience to be potentially violent or to have displayed aggressive tendencies. There will be occasions when sharing relevant information and risk assessments between sectors or units can be important in helping to prevent risk of violence to others. This is a sensitive area however; the question of confidentiality and the avoidance of 'labelling' will need to be carefully and fully thought out

The Role of the Police

17. Chelmsford College is committed to working together with the appropriate authorities to minimise the risks of violence to staff and to pursue prosecution in all cases of assault. The College will develop and maintain good links with the local police to develop an understanding of one another's working methods, responsibilities and constraints. In all instances when a member of staff has become the victim of a physical assault, the College will ensure that the incident is reported to the police (unless the employee objects).

Monitoring the Effectiveness of Measures

18. To establish how successful specific measures have been, it is essential to monitor their effect. Strategies that are not working or which have unforeseen consequences can then be identified and modified or replaced. Monitoring will be carried out by the Health and Safety Committee.
19. Investigations of reported incidents could provide useful information as to how successful measures have been, whether they need to be reviewed, or whether new areas need to be introduced; where appropriate Heads of Business Support units and Curriculum Area Managers and Heads of Department should carry out these investigations.

Support for Staff Who Have Been Subject to Violence

20. Heads of Business Support units, Curriculum Area Managers and Heads of Department have a responsibility to provide immediate support to a member of their staff who has been the victim of violence at work. Such support will include agreeing with the member of staff about absence from work and the provision of support from immediate colleagues or trained victim support, upon his/her return to work. A member of staff involved in an incident will not usually stay on duty, and the manager will talk to the employee to see how much time might be needed away from work. After returning home the employee will usually be telephoned to check on their well-being.
21. Heads of Business Support units, Curriculum Area Managers and Heads of Department will ensure that evidence is gathered and the incident is investigated. If the incident involved a student or fellow member of staff, the Head of the Business Support unit, Curriculum Area Managers and Heads of Department will ensure that the Director of Learning Experience & Progression and the Human Resources Manager are informed for consideration of disciplinary action.

22. Counselling is available for members of staff via the employee assistance programme or other external companies as arranged through Human Resources.
23. Human Resources will provide advice and guidance to the member of staff in claiming compensation for damage to property or from injuries suffered and legal advice and help in taking proceedings. The College will provide full support to all staff and managers to assist with any claim arising from an incident.
24. The College undertakes to advise and support employees in the event of criticism or legal proceedings by, or against, the person, or other members of the public. Where the action by the employees concerned, in the course of their employment, was reasonable under the circumstances and was consistent with agreed policies and procedures and taken in good faith for the benefit of students and/or staff.
25. The support system will operate so that the support is offered automatically; i.e. without the individual having to request it themselves.

Breaches of Security

26. The majority of incidents can be dealt with by staff without the need for further support. All attempts to defuse a situation should be made. If this is unsuccessful and a breach of security occurs, then the following members of staff should be contacted.
27. Moulsham Street and Princes Road Sites: initial contact will be made by either Reception Staff, Site Officers or Campus Officers. All of these staff are in radio contact. The Campus Officer, will, with the assistance of other members of staff, approach and carry out the necessary procedures for the dispersal of unwelcome visitors.
28. At all other times when the site manager is not available the Day Duty Officer on the site will take responsibility. Staff are reminded that they should not place themselves or others at risk and where necessary the Day Duty Officer will call the police.

Visitors

29. Visitors to the College will be directed to the appropriate Reception area - Moulsham Street, Princes Road, Dovedale Nursery and the Princes Salon. The member of staff meeting visitors is required to enter the visitor's name in the "Visitors? Book" held at either Reception counter, and also countersign the Visitors? Book. The visitor will be issued with an identification badge which must be worn at all times whilst on College business. Staff are encouraged to make their visitors aware of the necessary emergency procedures on arrival at the College and be provided with a Safeguarding leaflet. Reception staff must receive prior notification in order to provide the appropriate response to visitors.
30. Reception staff are advised to encourage the visitor to stay within Reception area to await the contact.

31. Reception staff are reminded that all visitors should be signed into the Visitors? book unless they are leaving the site immediately. i.e. delivery situations, post and supplies, and they should return badges and sign out on leaving.
32. Visitors must be met at the Reception area by a member of staff and accompanied to the arranged activity by a member of staff. On completion of the activity, the visitor should be accompanied back to Reception by a member of staff to ensure they sign out and return the visitors badge. Whichever staff member meets the visitor takes responsibility for ensuring that limitations are in place to preclude direct unsupervised access to learners. Should this not be entirely possible, then the staff member must assess and notate any possible risks.

Definition of Visitor

33. Visitors to the site will include all persons that are not:
 - a. Registered employees with the Corporation
 - b. Students studying at the College
 - c. Members of the Corporation.

This will include all Contractors and other members of the public.

Sub-Contractors

34. The College will ensure that Sub-Contractors have an up to date Safeguarding Policy and named manager responsible for safeguarding across their organisation. All Sub- Contractors will be required to submit an annual Self-Audit to the Director of Information Services who will ensure that audits encompass safeguarding and safer recruitment checks across all partnerships.

Security Duties - Site Staff

35. The Site Staff will have responsibility for ensuring the security of premises after completion of the standard college day; this will involve locking procedure, which is part of the procedure manual adopted by the Site and Facilities Manager.
36. Site Staff will be responsible for meeting and greeting potential clients to the College during hours that the Reception is not open, i.e. 06.00 hrs. to 07.30 hrs. and 21.00 hrs to 22.00 hrs. Monday to Thursday, and 06.00 hrs. to, 08.30 hrs. and 17.00 hrs to 22.00 hrs. on Friday. Campus Officers will also undertake this role from 8.00 a.m. to 5.30 p.m. Monday to Friday. Site staff will be responsible for ensuring security of the premises during these times and other occasions e.g. weekends, etc.
37. Site Staff will be responsible for the setting and deactivation of all alarm systems for College buildings.

38. Site Staff will be responsible for the maintenance of security and will involve:
- a. Escorting delivery drivers to the reception areas;
 - b. Assistance in the unloading such deliveries;
 - c. The reporting for duty on fire alarm activation/bomb threats activation and subsequent operation of the alarm as directed by the senior member of staff who takes control of the situation.
 - d. The security to the building after any break-ins or other incidents during overnight periods or when the College is closed.

Powers of Search

39. With reference to the College 'Stop and Search Policy', a person who refuses to open a bag so that it can be searched may lawfully be denied entry to college premises

Security of Premises

40. Staff have a role to play in ensuring the security of premises. Doors should not be propped open. Keys should only be issued to staff and a register of issued keys should be held by a 'responsible persons' in each curriculum area or business unit; wherever required. Unattended classrooms should be locked by the member of staff last using them. This will provide a measure of security for College equipment during the day, and staff are reminded of the need to secure windows on leaving the room.
41. The College insurance policy does not provide cover if theft takes place through an unlocked door and no signs of forcible entry are present.
42. During the day all computer rooms when not in use should be locked by the member of staff last using them. No exterior doors are to be locked because of the need to provide fire exit points. During final lock up at night the Site Staff will follow the locking procedure as produced by the Site and Facilities Manager.
43. Staff should report any damage or malfunction of doors or locks to Site Staff as soon as possible via the Estates Helpdesk system.
44. In the event of an incident outside of normal hours, the company monitoring the college's intruder or fire alarm system will contact the member of the site staff on duty who will attend the college, give assistance to the emergency services if required and will reset the security systems once the all-clear is given. The main door keys will be housed in new fire brigade boxes located outside the main reception areas at Moulsham Street and Princes Road; this will negate the need for the fire brigade to break down the glass doors in the event of visible smoke or fire being reported and will house vital documents needed by the Emergency Services.

Security of Personal Belongings

45. Staff are reminded to ensure the security of their vehicles whilst parked on College premises. Staff are advised not to bring large amounts of cash or valuables into the College. Coats, jackets, etc. should be placed on proper coat hooks away from doors, out of line of sight and without any valuables within. Handbags, wallets, etc. should be stored securely; preferably in lockers. Staff are reminded that the College is under no obligation to replace any personal possessions. It is recommended that employees check their own domestic insurance policies to ensure adequate cover is provided.

Access Control

46. The College operates the system whereby there are a small number of designated entry and exit points for each campus. Access control measures are in place on all other external doors; these measures are programmed to be overridden when emergency exit is necessary.
47. The rear doors of Mulsham Street main block are now secured by access control and are only accessible by staff and students with the use of a valid ID badge.

CCTV

48. The College has Closed Circuit Television (CCTV) and associated recording equipment across all campuses. This policy seeks to ensure that the CCTV system used at Chelmsford College is operated in compliance with the law relating to data protection (currently the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA 2018)) and includes the principles governing the processing of personal data. It also seeks to ensure compliance with privacy law. It takes into account best practice as set out in codes of practice issued by the Information Commissioner and by the Home Office.
49. Chelmsford College seeks to ensure, as far as is reasonably practicable, the security and safety of all students, staff, visitors, contractors, its property and premises. The College therefore deploys CCTV across both campuses to:
 - a. Promote a safe college community and to monitor the safety and security of its premises;
 - b. Assist in the prevention, investigation and detection of crime;
 - c. Assist in the apprehension and prosecution of offenders, including use of images as evidence in criminal proceedings; and
 - d. Assist in the investigation of breaches of its codes of conduct and policies by staff, students and contractors and where relevant and appropriate investigating complaints.
50. The CCTV system is owned by Chelmsford College and is operated by the Estates Department. All recorded material and Copyright is owned by the College. CCTV cameras are installed in such a way that they are not hidden from view. Signs are prominently displayed where relevant, so that staff, students, visitors and members of the public are made aware that they are entering an area covered by CCTV. The signs indicate:

- a. The presence of the cameras
 - b. The ownership details of the system
 - c. The purpose of the system
51. The CCTV system will not be used for the general surveillance of staff or students for the purpose other than those specifically indicated above. The system will not be operated for personal gain by any individual or financial gain by the College.
52. Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at access routes and areas covered by the college CCTV System.

CCTV - System Details.

The College has 110 overt colour cameras at its Moulsham Street Campus and 111 overt colour cameras at its Princes Road Campus. The cameras cover external areas, car parks and selected internal areas. CCTV Cameras are not installed in areas in which individuals would have an expectation of privacy such as within toilets areas, changing facilities etc. All cameras operate continuously 24 hours a day.

Image Capture.

Images are captured onto digital recording equipment and unless required as evidence are erased automatically after a maximum of 30 days. Images that are required by the Police are recorded onto a memory stick and may be retained as evidence.

CCTV Operation.

The CCTV system will be operated at all times under the supervision of the Estates & Facilities Manager. Operation of all CCTV and associated recording equipment is restricted to selected staff within the Estates Team and Campus Officers who have received training in the use of the system

Image Retention.

CCTV images are not to be retained for longer than necessary, taking into account the purposes for which they are being processed. Data storage is automatically managed by the CCTV digital recorders which overwrite historical data in chronological order. Provided that there is no legitimate reason for retaining the CCTV images (such as for use in disciplinary and/or legal proceedings), the images are to be erased following the expiration of any retention period. All retained CCTV images are to be stored securely.

Access to Recorded Material.

Recorded images, if sufficiently clear, are considered to be the personal data of the individuals (Data Subjects) whose images have been recorded by the CCTV system. Data Subjects have a right of access to the personal data under the GDPR and DPA 2018. They also have other rights under the GDPR and DPA 2018 in certain limited circumstances, including the right to have their personal data erased, rectified, to restrict processing and to object to the processing of their personal data.

Requests for Disclosure.

Any request for disclosure of information must be made to the Director of Information Services. Every disclosure of CCTV images must be noted with the record containing:

- a. The name of the police officer or other relevant person in the case of other agencies/bodies receiving the copy of the recording;
- b. Brief details of the images captured by the CCTV to be used in evidence or for other purposes permitted by this policy;
- c. The crime reference number where relevant; and
- d. Date and time the images were handed over to the police or other body/agency.

Third Party Access

Third party requests for access will usually only be considered in line with the GDPR and DPA 2018 in the following categories:

- a. Legal representative of the Data Subject;
- b. Law enforcement agencies including the Police;
- c. Disclosure required by law or made in connection with legal proceedings; and
- d. HR staff responsible for employees and College administrative staff responsible for students in disciplinary and complaints investigations and related proceedings.

Legal representatives of the Data Subjects are required to submit a letter of authority to act on behalf of the Data Subject along with a Subject Access Request and evidence of the Data Subject's identity.

Freedom of Information Requests.

Requests for CCTV information under the Freedom of Information Act 2000 will be considered in accordance with that regime.



REPORT FORM

Use this form for **ALL** ACCIDENT, ILLNESS, INCIDENT OR NEAR-MISS
SENSITIVE DATA – MAKE SURE YOU COMPLY WITH GDPR WHEN SENDING THIS FORM

What type of report is this? – circle one or more or highlight as applicable				
INJURY	ILLNESS	ACCIDENT	INCIDENT	NEAR-MISS
When did it happen?				
Date:	Time:	<u>MINOR</u> , <u>MEDIUM</u> or MAJOR occurrence?		
Details of person(s) injured etc. – circle or highlight as applicable				
STAFF	STUDENT	CONTRACTOR	VISITOR	CHILD
Name(s):		Student Ref (if applicable):		
Course or reason for visit:				
Where did it happen?				
MS	PR	OFF SITE	Room:	Further details (if necessary) of where it happened:
Category of incident? – include what body part(s) was injured if any (e.g. Epilepsy, cut, fracture, horseplay etc)				
		Body part	LEFT	RIGHT
				N/A
What happened? (continue on back if necessary) include the activity, what happened, who was involved, equipment in use, any witnesses?				
			Who else was there or saw the incident?	
Treatment or intervention? (Continue on back if necessary)				
Where did the person go directly after the event? (Time spent in hospital, back to lessons?)				
Signed				
Circle or highlight one or both as applicable:		First-aider	Author of report	
Name:	Signed:		Date:	
OFFICIAL USE - Health & Safety				
Form received:	Signed:	Date:		
Investigation required:	Yes / No	RIDDOR Reportable?	Yes / No	Date:
Any action(s) complete?	Yes / No	Date:		
Filed:	Signed:	Date:		

11 / 2022 – This document is available on A4 or A5 in Official Documents

Lost & Found Property - Log & Claim Form

Time, Date and Place Lost or Found	Date:
	Time:
	Place
Full details of person losing / claiming property	Name:
	Address:
	Home Tel No:
	Phone Ext:
	Department or Course:
Full description of Property including contents and total cash recorded:	
Time & date of report:	
Date property lost :	
Time & date property claimed :	
Claimants Signature:	
Identification Seen:	
Reporting Site Officer – Name:	
Signature:	
Log Book Page Number:	

Equality Impact Assessment (EIA) Initial Screening Form

Name of the Policy, Procedure, Practice or Proposal being screened:

Security and CCTV Operation

Provide a brief description of its purpose:

CCTV is used to provide security for staff and students and to deter acts of violence and damage to property

Are there controls in place to monitor the uniform application of this practice? (if no please explain below)

Yes

No

Does the policy or process have the potential to affect a particular group disproportionately in either a positive or negative way? Please provide comments with supporting evidence:

No

If you have identified a medium or high equality impact please complete the following, otherwise leave blank. Add additional comment below the questions as necessary.

Are there any other policies or practices that need to be assessed alongside this screening?

Yes

No

Should the policy or practice proceed to a full Equality Impact Assessment?

Yes	No
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If the answer to the above question is no, please give the reasons for this decision:

This policy is applied college wide and does not impact on any particular group of people.

If a full impact assessment is required, please give the date by which it will be completed

(Note – If you have assessed a negative impact as high, you must seek advice and conduct a full EIA on a high priority basis)

Declaration:

We are satisfied that an initial screening has been carried out and a full Equality Impact Assessment [is / is not] required at this time.

(If a full EIA is required, a template form is available within the EIA Guidance Notes which must be read before completing a full EIA).

Manager:

Signature:

T Gann

Date:

12/06/2023

Countersigned

Signature:

Debs Hurst

Date:

12/06/2023