

Sidney Sussex College

CCTV POLICY

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1. The CCTV system

- a. Sidney Sussex College has in place and is further developing a CCTV surveillance system, ("the system") throughout the College estate. Images are monitored and recorded centrally in strict accordance with this policy. The system is owned and managed by Sidney Sussex College, Sidney Street, Cambridge, CB2 3HU.

2. Responsible officers

- a. Senior staff are jointly responsible for the operation of the system and for ensuring compliance with this policy and any associated procedures. Contact details are provided in the Appendix to this policy.

3. Data Protection

- a. The College's CCTV system is used to maintain security of the premises and for preventing and investigating crime. This policy has been compiled with additional reference to:

CCTV Code of Practice 2017, Information Commissioners Office

Surveillance Camera Code of Practice, June 2013, Home Office

Code of Practice: A guide to the 12 principles, Surveillance Camera Commissioner

In the picture: A data protection code of practice for surveillance cameras and personal information, ICO, October 2017.

4. The system

- a. The system comprises fixed position cameras, monitors, recorders and public information signs. The cameras cover building entrances, car parks, perimeters, external and internal areas. Signs are prominently placed at relevant areas to inform staff, students, visitors and members of the public that CCTV is in place and that the system is managed by Sidney Sussex College.

5. Purpose of the system

a. The system has been installed by the College with the primary purpose of reducing the threat of crime, protecting the College's buildings and helping to ensure the safety of all staff, students and visitors. Additionally, a condition of the premises license issued by Cambridge City Council requires the College 'to maintain a suitable and sufficient CCTV surveillance system that produces images of sufficient quality for identification. Images shall be retained for 31 days and made available to the Police upon request'. These purposes will be achieved by:

- Deterring criminal activity by the use of signs displaying that a CCTV installation is in use around the estate
- Assisting in the prevention and detection of crime
- Facilitating the identification, apprehension and prosecution of offenders in relation to crime and public order
- Facilitating the identification of any actions or events which might result in disciplinary proceedings being taken against staff or students.
- Assisting in providing evidence to managers and/or to a member of staff or student against whom disciplinary or other action is, or is threatened to be, taken.
- Managing access to the College Car parks

The system will be provisioned and operated in a way that is consistent with an individual's right to privacy.

b. The system will not be used:

- To provide recorded images for publication or broadcast.
- To record sound other than, when required, in instances of covert recording, as detailed in Section 6.

6. Covert recording

- a. Covert cameras may be used under the following circumstances on the written authorisation or request of the Head Porter and where it has been assessed by the Senior Bursar in consultation with the Senior Management Committee and the College Data Protection Officer.
 - that informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording;
 - that there is a reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place
- b. Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity. The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

7. Access to images

- a. Access to live images will be restricted to staff that require access in order to fulfill the purposes of the system.
- b. A CCTV log will be maintained with full details of security incidents where CCTV images have formed an element of the incident information.

8. CCTV procedures

- a. Details of the administrative procedures which apply to the system will be set out in a CCTV Procedures Manual, a copy of which is available for inspection by prior arrangement, stating the reasons for the request.
- b. Images of identifiable living individuals are personal data. All recordings will be handled in strict accordance with this policy and the procedures set out in the CCTV Procedures Manual.

9. Staff

- a. All staff using the system will be fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.
- b. All staff using the system will be trained in the College's obligations, and their responsibilities, arising from the College's policies on protection of personal data.

10. Recording and retention

- a. Images will be recorded and normally kept for 31 days, after which time they will be automatically erased.
Longer retention periods may be used where there is a specific business need or justification. This will be authorised by the Head Porter and recorded in the CCTV log.
- b. In the event of a specific case or investigation, copies of footage may be retained for longer than the standard period. This will be authorised by the Head Porter and recorded in the CCTV log. The eventual date of erasure will also be recorded.

11. Disclosure to third parties

- a. Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and in line with the procedures laid out in the CCTV Procedures Manual.
- b. All such requests will be referred to the Head Porter and the College Data Protection Officer. They may be required by law to pass information on to national security services or the police.

12. Access to images by a subject

- a. CCTV digital images, if they show a recognisable person, are personal data. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions outlined in national data protection legislation. They do not have the right of instant access. A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Head Porter.
- b. The Head Porter will then arrange for a copy of the data to be made and given to the applicant. A response will be provided promptly and in any event within forty days of receiving the required fee and information.
- c. The College retains the right at all times to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders. If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.
- d. All such requests will be referred to the Head Porter and the College Data Protection Lead.

13. Freedom of Information

- a. Requests for CCTV footage can be made under the Freedom of Information Act, subject to the exemptions in that legislation. Requests should be made to bursar@sid.cam.ac.uk

14. Request to prevent processing

- a. An individual has the right to request a prevention of processing where this is likely to cause substantial and unwarranted damage or distress to that or another individual.
- b. All such requests should be addressed in the first instance to the Head Porter or the College Data Protection Lead, who will provide a written response within 21 days of receiving the request setting out their decision on the request. A copy of the request and response will be retained.

15. Complaints procedure

- a. Complaints or concerns concerning the operation of the CCTV system should be directed, in the first instance, to the Head Porter at: porters@sid.cam.ac.uk.
- b. Concerns or enquiries relating to the provisions of personal data may be addressed to the College Data Protection Lead at: DataProtection@sid.cam.ac.uk. These rights do not alter the existing rights of students, staff or customers of the College under any relevant grievance or disciplinary procedures.

16. Review and approval

- a. This policy has been approved by College Council and will be subject to an annual review.

17. Version Control

Date	Version	Reason for change	Author
5/11/2015	0.1	Initial draft.	Keith Willox
11/02/2016	0.2	Final version	Keith Willox
09/05/2018	0.3	Minor amendments	Max Beber

Appendix A – Responsible officers

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Head Porter
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Appendix B – Routine request for access to CCTV images

This form should be used for routine requests for access to view CCTV images by individuals whose images have been captured and /or Police officers in response to incidents to assist in a specific criminal enquiry, identify a victim, witness or perpetrator in relation to a criminal incident.

This form should not be used when the police or other law enforcement agencies request a copy of CCTV images.

This form should not be used by an individual whose image has been recorded who requests a copy of CCTV images relating to themselves. A subject access request is required for this type of access.

To be completed by Applicant

Date	
Person Making Request	
Organisation	
Reason for Request	
Crime reference number	

To be completed by College Data Protection Lead

Reason for allowing access / disclosure	
Reason for refusing access / disclosure	

Name & Signature	
Position	
Date	

Appendix C – Authority for Covert CCTV Recording

Covert CCTV may only be used on the written authorisation or request of the Head Porter and where it has been assessed by the Senior Bursar in consultation with the Senior Management Committee and the College Data Protection Lead.

Covert recording should only be used in cases:

- Where informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording.
- Where there is a reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to takeplace

To be completed by Applicant

Date	
Person Making Request	
Organisation	
Reason for Request	
Location Requested	
Period Requested	

To be completed by College Data Protection Lead

Reason for allowing Covert Recording including the minimum period of recording authorised	
Reason for refusing Covert Recording	

	College Data Protection Lead	Senior Bursar
Name & Signature		
Position		
Date		