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UNIVERSITY COLLEGE OXFORD

POLICY DOCUMENT

University College CCTV Code of Practice

In order to fulfil its educational, pastoral, administrative and employment responsibilities and to maintain security for its students, staff, visitors and premises, the College and its Departments need to collect and process personal data. The primary monitoring facility is located at the Porters' Lodge on High Street, Oxford.

CCTV viewing is classed as information processing and any CCTV product is classed as data under the Data Protection Act 2018 and the College has a legal obligation to comply with the law. Information must be collected and used fairly and proportionately, stored safely and securely and not disclosed to any third party unlawfully.

Document Purpose

This document details the operating standards and procedures for closed circuit television (CCTV) systems installed at University College in accordance with the requirements of:

- The Data Protection Act 2018 (DPA)
- The Home Office CCTV Code of Practice 2013 issued by the Information Commissioners Office (ICO)
- ICO data protection code of practice for CCTV and personal information 2014
- Article 8 of the Human Rights Act Right 1998 (Respect for Private and Family Life)

Operating Principles

To ensure compliance with the above, all CCTV operations must, at all times, adhere to the following principles:

- Fairly and lawfully processed;
- Processed for limited purpose and not in any manner incompatible with the purpose of the system;
- Adequate, relevant and not excessive;
- Accurate;
- Images are not retained for longer than is justifiably necessary;
- Processed in accordance with individuals' rights;
- Secure.

Operational Management

The operational management of the CCTV is the responsibility of the IT Director (Christopher Thompson) and/or the Head Porter (Mick Park).

Data and Privacy Protection - Responsible Persons

The College Data Protection Officer and also Data Protection Officer for the CCTV system and any product deriving from it is the Bursar (Andrew Grant) who is the final decision-making authority regarding requests under the terms of the Freedom of Information Act and requests from Data Subjects (persons whose images have been recorded by the system).

The College Data Controllers are the IT Director and the Head Porter who are responsible for safeguarding the data, preventing unauthorised access and compliance with the operating principles.

CCTV System Objectives

All cameras connected to the University College CCTV system are in place for the detection of crime and for the safety of students, staff and visitors.

CCTV Control of Viewing and Access to Data

All viewing and observing of the CCTV images will be carried out in a secure, private area. No unauthorised access to the CCTV screens will be permitted at any time. Access will be strictly limited to the duty Porters, ICT staff who are responsible for the CCTV infrastructure, the Data Controllers and the Data Protection Officer. Image saving to other formats such as a memory stick will only be carried out using either of the Data Controllers' computer terminals. CCTV viewing or observing in other places will only take place if authorised by the Bursar. This includes remote viewing.

Any staff member working in these areas should ensure that details of any event witnessed by a staff member via live footage is only revealed to other staff members if this information is required for the '"strict performance of their duties"- this permits staff to pass on important information seen on the live footage and ensures disclosure only when there is an operational need.

All staff working in the viewing area will be made aware of the sensitivity of handling CCTV images and recordings. The Head Porter will ensure that all staff are fully briefed and trained in respect of their responsibilities, operational and administrative, arising from the use of CCTV.

Each CCTV operator will be responsible for any usage of the system by them. They must ensure that all requests to show/review or produce and distribute any recorded footage has been authorised in writing by the Data Protection Officer or a Data Controller on the CCTV Request Form designed for this purpose.

Images are retained on a secure hard drive for up to 30 days; after this period they are automatically overwritten.

Subject to the appropriate Data Act, written request images are normally copied to a disc or memory stick which is then given to the requesting organisation or individual.

Access to and disclosure of CCTV images

Access or disclosure requests will only be authorised by the Data Protection Officer or a Data Controller.

Requests for access to or disclosure (i.e. provision of a copy) of images recorded on the College CCTV systems from third parties will only be granted if the request comes within the following categories:

1. Data subjects (persons whose images have been recorded by the CCTV systems).
2. Law enforcement agencies.
3. An authorised College member who has responsibility for student discipline - in the course of a student disciplinary investigation.
4. An authorised member of College staff in the investigation of a Health and Safety at Work Act incident.
5. An authorised member of College staff in the investigation of crime.
6. An authorised member of College staff in the investigation of staff disciplinary issues.
7. Relevant legal representatives of data subjects.

Access to images by a law enforcement agency

Law enforcement agencies may view or request copies of CCTV images subject to providing an appropriate written Data Protection Act 2018 request and in accordance with the protocols contained within this document. In very urgent serious cases of crime or public safety, relevant law enforcement agencies may view CCTV images if requested in person and subject to authorisation by one of the Data Controllers. Subsequent written authority is to be sanctioned by the Data Protection Officer or a Data Controller if the request by law enforcement agencies to view or copy CCTV is urgent and operationally necessary. The CCTV Request Form is used for this purpose and all written requests, whether granted or refused, are filed in the Porters' Lodge.

No action should be taken by any of University College's CCTV operators that frustrates or delays Police enquires and prevents or obstructs their investigation. CCTV operators should comply with all reasonable requests made of them by the Police or other agencies.
If the request is declined, the Data Protection Officer or a Data Controller will explain to the requesting party or representative why the request has been declined. A written and signed record using the CCTV Request Form is retained documenting the refusal and reason(s).

Access to images by an individual subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the

Data Protection Act 2018. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data (subject to exemptions contained in the Act) but 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 using the CCTV Request Form. All such applications must be made by the Data subject themselves or their legal representative. In accordance with Government guidelines a £10 search fee will be charged and is to be received by University College Bursary before data is supplied.
The Data Protection Act 2018 gives the Data Protection Officer the right to refuse a request for a copy of any data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, or the images have been erased. If a data subject access request is refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

System Description

Any changes or additions to the system will be in compliance with the Data Protection Act 2018 and the Information Commissioners Office CCTV code of practice.
University College CCTV has a number of IP cameras on site with images being transmitted to a secure server for storage and for recall at a later date, with a live feed being streamed from the server to the Lodge on the main site.
The system comprises: Fixed Position Cameras; Monitors: Multiplexers; Digital Recorders; Information Signs.
Cameras are located at strategic points in Main site, student accommodation at Harberton Meade, Staverton Annexe and the Boathouse. The system is not capable of recording audio.
There are signs prominently placed at strategic points and at entrance and exit points informing people that a CCTV installation is in use.
CCTV images are retained for up to 30 days, after this period the system automatically overwrites the existing data on a rolling basis.

System Registration

The existence of this policy and information on access and applications for copies of CCTV data should be referenced in the College handbook on the University College intranet.
A separate document (Appendix to this Code of Practice) will be produced which details the operational requirement of each CCTV camera, justifying its position and providing a snapshot of the camera view.
All additions or alterations to the current CCTV camera equipment must be authorised by the Data Protection Officer and the relevant Appendix amendments made by a Data controller.

Code of Practice / Policy and Procedures Review
(Reviewed annually as per ICO guidelines)
Written: November 2019
Next Review due: November 2020
Mick Park, Head Porter.

Request to View University College CCTV or a copy of University College CCTV

Date:

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Name of person requesting:

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Organisation:

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Contact details:

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Basic reason for requiring / requesting:

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……Verbal or written authorisation:

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Name of person authorising the viewing / copy:

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Signature:

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Date:

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IF REQUEST IS REFUSED:

Authority to view or have a copy made refused by:

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Reason for refusal:

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Signature:

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Date:

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