

UNIVERSITY OF LONDON

CCTV POLICY

Academic Buildings, Libraries and Residences

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The CCTV system

- 1 The University of London has in place and is further developing a CCTV surveillance system, ("the system") throughout the University estate. Images are monitored and recorded centrally in strict accordance with this policy. The system is owned by University of London, Senate House, WC1E 7HU and managed by the University and its appointed agents.

Responsible officers

- 2 Senior staff are jointly responsible for the operation of the system and for ensuring compliance with this policy and the procedures documented in the Procedures Manual. Contact details are provided in the Appendix to this policy.

Data Protection Act 1998

- 3 CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act. This Policy is associated with the University of London Data Protection Guidelines, the provisions of which should be adhered to at all times. For further information contact: records.management@london.ac.uk

The system

- 4 The system comprises fixed position cameras, monitors, recorders and public information signs. The cameras cover building entrances, car parks, perimeters, external areas and reception 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 the University of London. A contact number is provided.

Purpose of the system

- 5 The system has been installed by the University with the primary purpose of reducing the threat of crime, protecting the University's buildings and helping to ensure the safety of all staff, students and visitors consistent with respect for the privacy of individuals. 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 activities/event which might warrant disciplinary proceedings being taken against staff or students and assist 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.
- 6 The system will not be used:
- To provide recorded images for the world-wide-web.
 - To record sound other than in accordance with the policy on covert recording.
 - For any automated decision taking

Covert recording

- 7 Covert cameras may be used under the following circumstances on the written authorisation or request of the Head of Facilities Management or Director of Properties and Facilities and where it has been assessed by the Head of Facilities Management and the University Records Manager:
- 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
- 8 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.

Control room

- 9 Other than Security Control Room personnel, access to the Security Control Room will be limited to Responsible Officers named in section 2, Security Operations Manager and Supervisor and authorised members of senior management, police officers and any other person with statutory powers of entry. Images captured by the system will be monitored and recorded in the Security Control Room, "the control room", twenty-four hours a day throughout the whole year. Monitors are not visible from outside the control room.
- 10 No unauthorised access to the Control Room will be permitted at any time.
- 11 Staff, students and visitors may be granted access to the Control Room on a case-by-case basis and only then on written authorisation from the Head of Facilities Management. In an emergency and where it is not reasonably practicable to secure prior authorisation, access may be granted to persons with a legitimate reason to enter the Control Room.
- 12 Before allowing access to the Control Room, staff will satisfy themselves of the identity of any visitor and that the visitor has appropriate authorisation. All visitors will be required to complete and sign the visitors' log, which shall include details of their name, their department or organisation they represent, the person who granted authorisation and the times of entry to and exit from the centre. A similar log will be kept of the staff on duty in the Security Control Room and any visitors granted emergency access

CCTV procedures

- 13 Details of the administrative procedures which apply to the system will be set out in a Procedures Manual, a copy of which is available for inspection by prior arrangement, stating the reasons for the request.
- 14 Images of identifiable living individuals are subject to the provisions of the Data Protection Act 1998; the Control Room Supervisor is responsible for ensuring day to day compliance with the Act. All recordings will be handled in strict accordance with this policy and the procedures set out in the Procedures Manual.

Staff

- 15 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.
- 16 All staff using the system will be trained in the University's obligations, and their responsibilities, arising from the Data Protection Act 1998.

Recording and retention

- 17 Images will be recorded and normally kept for 30 days, after which time they will be erased. Longer retention periods may be used where there is a specific business need or justification. This will be authorised by the Head of Facilities Management.
- 18 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 of Facilities Management and logged. The eventual date of erasure will also be recorded.

Disclosure to third parties

- 19 Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and the Data Protection Act 1998.
- 20 All such requests will be referred to the Head of Facilities Management and the University Records Manager.

Access to images by a subject

- 21 CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act. 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. 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 University's Legal Services team. Subject Access Request Forms are available on our website at <http://www.london.ac.uk/238.html>.
- 22 The University Records Manager 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.
- 23 The Data Protection Act gives the University the right 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.
- 24 All such requests will be referred to the Head of Facilities Management and the University Records Manager.

Freedom of Information

- 25 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 records.management@london.ac.uk.

Request to prevent processing

- 26 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.
- 27 All such requests should be addressed in the first instance to the Head of Facilities Management or the University Records Manager, 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.

Complaints procedure

28 Concerns or enquiries relating to the provisions of the Data Protection Act 1998 may be addressed to the University Records Manager at records.management@london.ac.uk. These rights do not alter the existing rights of students, staff or customers of the University under any relevant grievance or disciplinary procedures.

Review and approval

29 This policy has been approved by the Operational Development Group of the University and will be subject to an annual review.

Version Control

Date	Version	Reason for change	Author
March 2012	0.1	Initial draft.	University Records Manager
October 2012	0.2	Technical detail added, responsible officers added, defined as overarching policy for 'Academic Buildings, Libraries and Residences'.	Facilities Services Manager
October 2012	0.3	Contents page, version control and 'sign-off' sections added.	University Records Manager
February 2013	0.4	Minor changes and formatting adjustments.	University Records Manager
June 2013	0.5	Approved by the University's Operational Development Group	University Records Manager
June 2013	0.6	Minor change to paragraph 17, suggested by Information Compliance Group.	University Records Manager
July 2013	1.0	Approved by the Vice-Chancellor's Executive Group	University Records Manager

Appendix A – Responsible officers

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Appendix B – Related procedural documents

CCTV Review Register

CCTV Review Request form

CCTV Procedures manual