



WOLF-W-P015

## Wolfson College CCTV Standards and procedures

### 1. Introduction

For the purposes of this document operator of the CCTV system is Wolfson College and the Operational Manager is Home Bursar, Chris Licence. Under the Data Protection Act (DPA), the 'data controller' for the images produced by the system is Wolfson College.

### 2. CCTV System objectives

The objective of the CCTV system is the prevention and detection of crime and **assisting with upholding College policies / procedures to ensure the safety of staff, students and visitors.**

### 3. Document purpose

This document details the operating standards and procedures for the Closed Circuit Television system installed at Wolfson College in accordance with the requirements of

- The Data Protection Act 1998 (DPA)
- Article 8 of the Human Rights Act 1998. Respect for Private and Family Life.

### 4. Data Protection

As the data controller for the System, the College is obliged to comply with the data protection principles embodied in the GDPR (General Data Protection Regulations).

These principles require that personal data shall:

1. Be processed fairly and lawfully:

The College meets this requirement by displaying clear and visible signs to indicate the presence of CCTV (Section 12), and to explain the purposes for which it is used: and by ensuring that the System is used only where it is a necessary and proportionate means of achieving the purposes for which it was established (Sections 2,6,7,8 & 9).

2. Be held only for specified **and/or legitimate** purposes and not used or disclosed in any way incompatible with those purposes:

The College meets this requirement by providing signs to explain the purposes for which the CCTV is used in (Section 12), by defining the objectives of the System in this policy (Section 2) and by carrying out annual audits to review the continued justification for deploying individual cameras in relation to those objectives (Section 14).

3. Be adequate, relevant and not excessive:

The College meets this requirement by ensuring that the System is not used to look into private residential property and serves only its intended purposes (Sections 7 & 9).

4. Be accurate and kept up-to-date:

The College meets this requirement by ensuring through regular maintenance that the System is capable of producing images of sufficient quality to be admitted as evidence in legal proceedings (Section 16).

5. Not be kept for longer than necessary for the particular purpose:

The College meets this requirement by ensuring that the routine retention of recorded material does not exceed 30 days (Section 13).

6. Be processed in accordance with the rights of individuals:

The College meets this requirement by responding appropriately to those seeking copies of images produced by the System (Section 5);

7. Be kept secure:

The College meets this requirement by formulating and implementing appropriate technical and organisational policies and procedures (Sections 7, 8, 9, 11 & 13).

8. Not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection:

Personal data from the System will not normally be transferred outside the EU.

## **5. Disclosure**

### **Requests for Copies of CCTV images from individuals**

Individuals are entitled to requests copies of CCTV images. If they wish to see their own image, the request will be processed under GDPR as a 'subject access request'. If they wish to see other images, the request will be processed under the Freedom of Information Act (FOIA). There is no requirement for individuals to refer to either piece of legislation when making their request.

Action to be followed:

If an individual asks the College to provide a copy of a CCTV image, whether orally or in writing, the college will:

- A. Record the following information from the individual:
  - name and address
  - nature of the images requested
  - the date and time the images were recorded
  - the location of the CCTV camera
  - information to identify the individual if necessary
- B. Seek to ensure that the relevant images are preserved by making a copy. The OM must be informed that a potential 'subject access request' or Freedom of Information request has been made;
- C. Retain the images securely for a period of 12 months; and
- D. Ask the individual to contact the Home Bursar, by email stating why they want to view the image/s.

### **Requests to View CCTV images from individuals**

Individuals may wish only to view an image rather than obtain a copy e.g. to check for a lost item of property or to see if there are images of their bike being stolen etc. Such requests should be treated with caution, as the viewing of an image showing other people would still fall within the scope of the GDPR

Action to be taken by the department

- Establish clearly why the individual wants to view the image
- If the department is satisfied that the request is being made for a legitimate reason, an authorised member of staff should offer to view the image on behalf of the individual and to inform them of what it shows.
- An individual should only be allowed to view an image themselves where (i) the image does not show other people: and (ii) it can be viewed without gaining access to other images.
- If the image clearly shows other people and the individual insists on seeing the image for themselves, they should be asked to email the Home Bursar.
- If they wish to receive a copy of the image, the procedure outlined above should be followed.

### **6. Operational management and authorised persons**

The operational management of the CCTV system, storage, access and downloading of image will be the responsibility of Home Bursar, Chris Licence. The persons authorised to monitor the CCTV are Lodge Staff, IT Staff and the Home Bursar.

CCTV monitors will be positioned so that authorised personnel only can view the images.

### **7. Privacy**

Cameras will not be used to look into private residential property. Where equipment permits it 'privacy zones' will be programmed into the system as required in order to ensure that the cameras do not survey the interior of any residential property within range of the system. If such 'zones' cannot be programmed the authorised persons will be specifically trained in privacy issues.

## **8. Complaints**

A member of the public wishing to register a complaint with regard to any aspect of the College CCTV Scheme may do so in writing addressed to:

Chris Licence  
Home Bursar  
Wolfson College  
Oxford  
OX2 6UD

The Home Bursar will ensure that every complaint is acknowledged in writing within a reasonable time period, which will include advice to the complainant of the enquiry procedure to be undertaken. The Home Bursar will liaise with the Data Controller and Legal Services. The complainant will be informed in writing the result of the investigation.

## **9. System Inspection**

In the interest of openness and transparency there will be unrestricted access to the CCTV System to any College personnel nominated to carryout inspections.

## **10. Public Information**

A copy of the department CCTV standards and procedures document will be made available on request.

## **11. Staff training**

The Home Bursar and authorised staff only should receive appropriate training to perform their duties in relation to operating, monitoring, accessing and downloading CCTV images. All users should be proficient in their CCTV duties and be familiar with their handling data responsibilities under the Data Protection Act 1998; staff could commit a criminal offence if they misuse CCTV data.

Staff will be inducted by the Home Bursar and training needs to be reviewed annually.

## **12. Signage**

It is necessary to let people know that they are in an area where a surveillance system is in operation. The department will display prominent CCTV in operation warning signs, the signs should be clearly visible and readable and contain:

- (i) details of the College operating the system,
- (ii) why the system is operating (i.e. the purposes),and
- (iii) who to contact for further information.

An example of wording: "Images are being monitored and recorded for the purposes of crime prevention and detection and public safety. The scheme is operated by Wolfson College for more information call 01865 274100".

### **13. Retention of recorded images**

To comply with GDPR, images must not be retained for longer than is necessary to meet the purpose for which they are recorded.

CCTV images will be retained for: 30 days

The CCTV recorder is retained in a secured location with strictly limited access.

### **14. Reviewing camera positions**

All CCTV cameras should be located to perform the objective(s) of the CCTV system. The Home Bursar will review all camera positions on an annual basis to ensure that there is still a 'pressing need' and a 'legitimate reason' for their presence. Those cameras no longer required will be removed.

### **15. New cameras**

The Home Bursar together with the relevant stakeholders must give permission for any new camera, ensuring that there is a pressing need and a legitimate reason for each camera.

### **16. Maintenance of CCTV system**

There is a regular maintenance contract in existence for the CCTV system which includes regular servicing of all component parts of the camera system.