CCTV POLICY: Policy on the Use of CCTV on College Premises

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Purpose and Scope

1. Corpus Christi College (the College) uses closed circuit television (CCTV) images to protect the College’s property and to provide a safe and secure environment for members and employees of the College, and visitors to the College’s premises.

2. This policy sets out the use and management of the CCTV equipment and images in compliance with the relevant data protection legislation and the Information Commissioner’s Office CCTV Code of Practice.

3. The specific purposes of the College installing and using CCTV systems include:

   a) to assist in the prevention, detection, investigation of crime and in any subsequent prosecutions;
   b) to assist in the detection and investigation of any activity that might warrant actions or disciplinary proceedings being taken against any member, student, employee or visitor of the College, and to assist in any subsequent proceedings;
   c) to assist in investigations and provide evidence for disciplinary proceedings by the University of Cambridge, any College of the University of Cambridge, or any other relevant organisation;
   d) to monitor and ensure the security and of the College’s premises and community;
   e) to ensure adherence to health and safety practices.

Locations of Cameras

4. Cameras are located at strategic points throughout the College’s premises, including outside the space occupied by the Cambridge Colleges’ Conservation Consortium. No camera focuses,
5. or will focus, on any private area of the College, including toilets, shower facilities, changing rooms, staff break rooms, private residential or Fellows’ rooms.

6. Signage is displayed to inform both the College community and the public that a CCTV system is in operation.

Recording and retention of images

7. Images produced by the CCTV equipment are as clear as possible to make them effective in fulfilling their intended purposes. The equipment is checked on a regular basis to ensure it is working properly and producing high quality images.

8. Images may be recorded either constantly (24 hours a day throughout the year), or only at certain times, as the needs of the College dictate.

9. CCTV images held on a hard drive within the recording system are deleted and overwritten on a 30 day cycle. Images that are copied or transferred onto other media are erased or destroyed once the purpose of the images is no longer relevant.

10. If images are shared with an external third party (i.e. a party that is external to the College, such as a law enforcement agency) then the third party will become the data controller of those images. Consequently, the third party’s data retention schedule will dictate how long those images are held. The College keeps a register of all data sharing with third parties.

Access to images and disclosure of images

11. Access to images recorded by the CCTV system is restricted to ensure that the rights of individuals are retained. Images can only be accessed or disclosed in accordance with the purposes for which they were originally collected.

12. Images are recorded centrally and held in a secure location. Only the porters, who operate the CCTV system in the course of their duties, and staff in the Information Services and Technology department, who manage the system, are able to access the recorded images.

13. All access to recorded CCTV images, other than live time monitoring by the porters, will be documented. Viewings of recorded images will take place in a restricted area, from which everyone who is not directly involved will be excluded. If any images are copied or transferred out of the system for viewing purposes then this will be similarly documented.

14. The Bursar, Dean of College, Senior Tutor and Head Porter (or Deputy Head Porter) are the only people who may permit other members, employees or visitors of the College to view CCTV images, unless there is a legal obligation for the College to do so.

15. The Bursar, Dean of College, Senior Tutor and Head Porter (or Deputy Head Porter) are the only people who can authorise the disclosure or provision of images to an external third party, unless there is a legal obligation for the College to do so.
16. Images will only be disclosed to external third parties in limited circumstances, and in accordance with the purposes for which the system is intended. They will normally be disclosed only to the following:

a) the police and other law enforcement agencies, where the recorded images could assist in the prevention or detection of a specific crime, the identification of a victim or witness, or the identification and prosecution of an offender;
b) prosecution agencies, such as the Crown Prosecution Service;
c) relevant legal representatives;
d) another College, the University, or another relevant organisation, where a clear case has been made that the images recorded could assist in an investigation under their Disciplinary Procedures, or where it is necessary for the purposes of an investigation under the Disciplinary Procedures of this College.

17. All requests for disclosure or access to images will be documented, including the reason that access or disclosure was requested, the reason for allowing the request, the date of any disclosure or provision, the identity(s) of the person(s) to whom the images have been disclosed or provided, and the extent of the information disclosed or provided. If disclosure or access was denied, the reason will be recorded.

Access by Data Subjects

18. Under the relevant data protection legislation, individuals have the right to receive, on request, a copy of the personal data that the College holds about them, including CCTV images in which they are recognisable.

19. If a data subject wishes to access any CCTV images relating to them, a written request should be made to the Data Protection Coordinator of the College at dpc@corpus.cam.ac.uk. Where possible, access requests should include the date and time when the images were recorded and the location of the particular CCTV camera.

20. The Data Protection Coordinator (with the assistance of a member of staff from the Information Services and Technology department if necessary) will respond promptly, and in any case within the legally required time. The College will always check the identity of the person making the request before processing it.

21. The Data Protection Coordinator will also determine (i) whether disclosure to the individual concerned will entail disclosing images of any other parties or reveal any information about any other party; (ii) whether it is necessary, in order to avoid an unfair intrusion into the privacy of the other party, to disguise, blur or otherwise obscure images relating to them.

22. If the College is unable to comply with a data access request within the legally required time, or because it could prejudice the prevention or detection of crime, the apprehension or prosecution of offenders, or College Disciplinary Proceedings, the applicant will be advised accordingly.
Covert Recording

23. The College will only undertake covert recording with the written authorisation of the Master, Bursar, Dean of College, or Senior Tutor, where there is good cause to suspect that criminal activity or equivalent malpractice, professional misconduct, or a serious breach of the College Rules is taking (or is about to take) place, and where informing the individuals concerned that recording is taking place would seriously prejudice the objective of the recording. Covert monitoring may include both video and audio recording.

24. Covert monitoring will only take place for a limited and reasonable amount of time, consistent with the objective of assisting in the prevention and detection of specific suspected criminal activity or equivalent malpractice, professional misconduct, or serious breaches of the College Rules. Once the specific investigation has been completed, covert monitoring will cease.

25. Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice, professional misconduct, or serious breaches of the College Rules. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information that the College cannot reasonably be expected to ignore.

Training

26. The College will ensure that all those handling CCTV images or recordings are trained in the operation and administration of the CCTV system, in the operation of this Policy, and on the impact of the relevant data protection legislation with regard to the CCTV system.

Implementation

27. The Head Porter is responsible for the implementation of this Policy, compliance with this Policy, and the operation of the CCTV system. Any enquiries about the operation of the College’s CCTV system should be addressed to the Head Porter.