

CORPUS CHRISTI COLLEGE  
University of Cambridge

## Policy on the Use of Surveillance Cameras on College Premises

<b>Purpose</b>	To set out the use and management of Surveillance Cameras and images in compliance with the relevant data protection legislation and the Biometrics and Surveillance Camera Commissioner's Amended Surveillance Camera Code of Practice.		
<b>Author</b>	Simon Harding, Head Porter		
<b>Responsible Committee</b>	Executive Body		
<b>Current Version</b>	2.1	<b>Revision Date</b>	26 March 2024
<b>Approved by</b>	Head of Governance	<b>on</b>	27 March 2024
<b>Next review due</b>	25 March 2025		
<b>Review schedule</b>	Annually, or as needed, by the author; minor revisions to be approved by Head of Governance. Executive Body to review and approve every 3 years and in case of any substantive change.		
<b>Revision history</b>	A history of revisions to this policy is included at the end of the document.		

## **1. Purpose and Scope**

- 1.1 Corpus Christi College (the College) uses a surveillance camera system 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.
- 1.2 This Policy sets out the use and management of the surveillance camera system and images in compliance with the relevant data protection legislation and the Biometrics and Surveillance Camera Commissioner's Amended Surveillance Camera Code of Practice.
- 1.3 The College uses surveillance cameras for the following specific purposes:
  - 1.3.1 to assist in the prevention, detection, investigation of crime and in any subsequent prosecutions.
  - 1.3.2 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.
  - 1.3.3 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.
  - 1.3.4 to monitor and ensure the security and of the College's premises and community.
  - 1.3.5 to ensure adherence to health and safety practices.

## **2. Locations of Cameras**

- 2.1 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, or will focus, on any private area of the College, including toilets, shower facilities, changing rooms, staff break rooms, private residential or Fellows' rooms.
- 2.2 Signage is displayed to inform both the College community and the public that a surveillance camera system is in operation.

## **3. Recording and Retention of Images**

- 3.1 Images produced by the surveillance camera system 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.
- 3.2 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.
- 3.3 Surveillance camera 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.
- 3.4 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) in accordance with section 4.6 below, 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.

#### **4. Access to Images and Disclosure of Images**

- 4.1 Access to images recorded by the surveillance camera system is restricted to ensure that the rights of individuals are protected and that the College is compliant with data protection legislation. Images can only be accessed or disclosed where necessary to fulfil the purpose(s) for which they were originally collected.
- 4.2 Images are recorded centrally and held in a secure location. Only the porters, who operate the surveillance camera system in the course of their duties, and designated staff in the Information Services and Technology Department, who manage the system, can access live and recorded images.
- 4.3 All access to recorded 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 documented. Access documentation will be reviewed annually to ensure appropriate use.
- 4.4 The Bursar, Dean of College, Senior Tutor, and Head Porter (or, in their absence, Deputy Head Porter) are the only people who may permit other members or employees of the College to view images, and only in accordance with this Policy and data protection legislation.
- 4.5 The Bursar, Domus Bursar and Head Porter (or the Deputy Head Porter in their absence) are the only people who can authorise the viewing or disclosure of images to an external third party, unless there is a legal obligation for the College to do so.
- 4.6 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 be disclosed only to the following:
  - 4.6.1 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.
  - 4.6.2 prosecution agencies, such as the Crown Prosecution Service.
  - 4.6.3 relevant legal representatives.
  - 4.6.4 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.
- 4.7 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.

## **5. Access by Data Subjects**

- 5.1 Under data protection legislation, individuals have the right to receive, on request, a copy of the personal data that the College holds about them through a Data Subject Access Request, including images in which they are recognisable.
- 5.2 If a data subject wishes to access any images relating to them, a written request should be made to the College Data Protection Coordinator at [dpc@corpus.cam.ac.uk](mailto: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 surveillance camera(s).
- 5.3 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 time required by law. The College will always check the identity of the person making the request before processing it.
- 5.4 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, to avoid an unfair intrusion into the privacy of the other party, to disguise, blur or otherwise obscure images relating to them.
- 5.5 If the College is unable to comply with a data access request within the required time required by law, 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.

## **6. Covert Recording**

- 6.1 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, or professional misconduct, is taking place or 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.
- 6.2 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. Once the specific investigation has been completed, covert monitoring will cease.
- 6.3 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 during (i.e., a party that is external to the College, such as a law enforcement agency) covert monitoring will be deleted or destroyed unless it reveals information that the College cannot reasonably be expected to ignore.

## **7. Training**

- 7.1 The College will ensure that everyone handling surveillance camera images and recordings are trained in the operation and administration of the system, in the operation of this

Policy, and on the impact of the relevant data protection legislation for operation of the system.

**8. Implementation**

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

**Revision history**

<b>Version</b>	<b>Author</b>	<b>Summary of changes</b>	<b>Review date</b>	<b>Approved by</b>	<b>Approval date</b>
1.0	Simon Harding, Head Porter	Initial policy (as CCTV Policy)	October 2019	EB	21 October 2019
2.0	Simon Harding, Head Porter	Complete review	13 September 2022	EB	29 September 2022
2.1	Simon Harding, Head Porter	No substantial changes	26 March 2024	Head of Governance	27 March 2024