

## POLICY FOR THE USE OF CCTV SURVEILLANCE SYSTEMS

### 1. Introduction

The University of Worcester uses surveillance camera technology in order to provide a safe and secure environment for students, staff and visitors and to protect University property. This policy outlines the purpose, use, and management of the CCTV installations and other surveillance systems at the University of Worcester and the considerations it has made to ensure this is in accordance with other legislation including Data Protection and Human Rights.

#### 1.1 The purpose of the use of CCTV installations and other surveillance camera technology is:

- to promote a safe community environment.
- to protect staff, students, visitors, and the assets of the University.
- to assist with the prevention, investigation and detection of crime and disciplinary offences in accordance with the University disciplinary procedures.
- to enable the apprehension and prosecution of offenders (including the use of images/data as evidence in criminal / civil proceedings).
- to monitor security of university buildings and areas.
- to assist in traffic management and parking enforcement.

#### 1.2 The CCTV system will not be used:

- to provide recorded images for the internet.
- to record sound, with the exception of body worn videos (BWV) operated by PCSOs and Security. Individuals are warned when the BWVs are activated wherever possible and practicable.

#### 1.3 The principles of the policy are:

- that individuals' rights are respected and protected.
- that the installations are operated fairly and within the law.
- that the surveillance CCTV system is operated for the purposes for which it was set up.
- that the recorded material/data stored is fairly and lawfully processed.
- that recorded material/data is adequate, relevant and not excessive for the purposes.
- that recorded material/data is accurate, securely stored, and not kept for longer than is necessary.

#### 1.4 This policy and its operations will be subject to regular reviews and audits, no less than every two years.

## **2. CCTV System overview and definitions**

2.1 The CCTV system includes approximately 325 cameras over four Sites:

- St Johns Campus, including Barrington House
- Severn Campus
- City Campus
- Lakeside Campus

2.2 Cameras are located in various areas around these campuses including:

- Car Parks, roadways, footpaths and other external areas
- Building and site entrances/exits
- Academic buildings
- Service buildings
- Bars & retail areas
- The Students' Union
- Residences

2.3 There are several types of cameras –

- Overt fixed – these record uncontrolled images e.g., reception desk, doors etc.
- Overt Pan, Tilt, zoom (PTZ) – these are controllable cameras that can follow vehicles or subjects when required.
- Body worn – used by security staff on patrol when dealing with drunkenness, violence and anti- social behavior
- Vehicle installed cameras used for driver safety

For the purposes of this Policy all of the above are referred to as “CCTV”

2.4 The CCTV installations comprise all fixed cameras, signs, recording and playing equipment, information, material, data, and any ancillary equipment required for the operation of the installations (e.g., cabling, printers, power supplies).

2.5 Recorded material/data means any material recorded by the installations, either in digital or analogue form on CD, PC computer system hard drive, hard copy print, or any document copy. The recorded material/data are the property of the University of Worcester

2.6 The systems will be operated 24 hours per day, 365 days of the year by trained SIA (Security Industry Authority) licenced University Staff

## **3. CCTV Owners and Roles**

3.1 The CCTV surveillance system is owned by the University of Worcester.

3.2 Roles

3.2.1 The Pro Vice Chancellor Finance and Resources has overall accountability for the system, with nominated individuals given authority to manage the day-to-day operations and ensure strict compliance with this policy.

- 3.2.2 The Assistant Director – Security and Operations is responsible for the management and operation of the system.
- 3.2.3 The Head of Security is responsible for the day-to-day management of the system
- 3.2.4 The University Secretary is responsible for overseeing and approving data to be released in accordance with data protection legislation.
- 3.2.5 The Information Governance and Legal Officer is responsible for the management of any requests for CCTV footage and ensuring compliance with data protection legislation.

#### **4. Legal Compliance**

- 4.1 The University's CCTV installations will be operated in accordance with applicable data protection legislation (defined as the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR) and Article 8 of the European Convention on Human Rights (ECHR).
- 4.2 For the purposes of data protection legislation, the University of Worcester is the Data Controller. The University's Data Protection Officer is the University Secretary ([infoassurance@worc.ac.uk](mailto:infoassurance@worc.ac.uk))
- 4.3 The University has chosen to adopt the SIA licensing requirements.

#### **5. Access to images**

- 5.1 The ability to review recorded and live images is limited to authorised staff personnel including:
  - Pro Vice Chancellor Finance and Resources Assistant Director of Security and Operations
  - Head of Security
  - Control Room Operators
  - Security Team Leaders
  - University Secretary
  - Information Governance & Legal Officer
  - Chief Executive of the Students' Union for footage recorded in the Students' Union

Access to recorded images may also be given to other members of the University or third parties by the University Secretary subject to the requirements of data protection legislation.

- 5.2 Other staff may view only live images, only as part of their day-to-day responsibilities.
- 5.3 The University will ensure that relevant staff have undertaken appropriate CCTV training.

#### **6. Disclosure of Images to Third Parties (Excluding Data Subjects)**

- 6.1 Disclosure of recorded images will be restricted and carefully controlled. This will ensure

that the rights of individuals are protected, and that images can be used as evidence if required. Images can only be disclosed in accordance with the purposes for which they were originally collected and in accordance with the UK GDPR and Data Protection Act.

- 6.2 Access to recorded images will be restricted to those staff or external agencies who have a lawful basis to view them and will not be made more widely available. Viewing of recorded images shall only take place in a restricted area to which other employees, students or members of the public will not have access while viewing is occurring.
- 6.3 The Police, other law enforcement agencies and insurance firms may make an application to view, or for the release, of CCTV images and footage. These can only be released upon receipt of an appropriate GDPR request form, approved by the University Secretary, or in their absence the Information Governance & Legal Officer.
- 6.4 CCTV images and footage may on occasion be released when it is considered that is appropriate to do so under a relevant University procedure, for example Staff or Student Disciplinary Procedures. Requests for this data should be made to the University Secretary via the CCTV Subject Access Request form at Appendix 1 to this Policy
- 6.5 Disclosure will be made where it is authorised by law or in compliance with a Court Order.
- 6.6 All requests should be made within 9 days of the recording to ensure footage is not erased and submitted to the University Secretary

## **7. Individual Access Rights by Data Subjects**

- 7.1 The UK GDPR gives individuals (data subjects) the right to access their personal data which includes CCTV images. All requests for access to images by data subjects should be made by using the form at Appendix 1 [insert link] to this Policy, accompanied by an appropriate form of photographic ID to enable them to be identified.
- 7.2 Only the data of those individuals making the request can be released. Where the recorded images contain the data of other 3<sup>rd</sup> parties, this cannot be released as this would be in breach of their privacy rights.
- 7.3 Applications from Data Subjects shall be considered in accordance with the University's Data Protection Policy

## **8. Retention and disposal**

- 8.1 Unless required for evidential purposes or the investigation of a crime or otherwise required by law, recorded images will be retained for no longer than 9 days from the date of recording and managed in accordance with the [University's Data and Records Retention Schedule](#)
- 8.2 At the end of their useful life discs will be erased and securely disposed of.

## **9. Complaints Procedure and Enquiry Service**

- 9.1 Complaints received in relation to the use of the CCTV system should be made in the first

instance to the Pro Vice Chancellor Finance and Resources Complaints will be acknowledged within 5 working days and a response will be made to the complainant within 20 working days.

9.2 Complaints in relation to the disclosure or image supply should be made in writing to the University Secretary ([infoassurance@worc.ac.uk](mailto:infoassurance@worc.ac.uk)) within 5 days of the incident. Complaints will be acknowledged within 5 working days and a response will be made to the complainant within 20 working days.

9.3 For general enquiries in relation to CCTV and this policy please email: Assistant Director Security and Operations - [t.taylor@worc.ac.uk](mailto:t.taylor@worc.ac.uk)

## 10. Relevant Policies

[Data Protection Policy](#)

[Records and Document Retention Schedule](#)

[Information Security Policy](#)

<b>Owner</b>	University Secretary
<b>Approved by</b>	University Executive Board
<b>Approval Date</b>	20th April 2023
<b>Version</b>	2
<b>Review Date</b>	April 2026
<b>Accessibility Checked</b>	April 2023



## CCTV SUBJECT ACCESS REQUEST FORM

The UK GDPR gives individuals (data subjects) the right to access their personal data which includes CCTV images. Only the data of the individual data subject who is making the request can be released.

Therefore, where the recorded images contain the data of other 3<sup>rd</sup> parties, this cannot be released under Subject Access as this would be in breach of their privacy rights.

Please complete this form, providing as much information as possible, should you wish to exercise your right in requesting disclosure of your data recorded on CCTV.

<b>1. PERSONAL DETAILS</b>	
Applicant's full name:	
Applicant's postal address:	
Applicant's email address:	
<b>2. INFORMATION REQUIRED</b>	
<b>To help us find the CCTV data you require, please complete the following section.</b>	
Location/position of CCTV camera:	
Date image taken:	Time image taken:
Brief description of the applicant's appearance and likely activities captured by CCTV:	
A recent photograph is also required to assist identification of the relevant images.	

Any other information that might assist us in finding the information required:

Do you require a hard copy of the image or would "viewing" the images be sufficient?

Hard copy

Viewing

### 3. DECLARATION

I confirm that all of the information I have provided is correct and that I am the Data Subject.

Signed:

Date:

**OR**

I confirm that I am acting on behalf of the Data Subject and have submitted proof of my authority to do so.

Name:

Postal address:

Email address:

Signed:

Date:

### 4. PROOF OF IDENTITY

If you are the Data Subject, please supply evidence of your identity: driving licence or passport

If you are applying on someone else's behalf, please enclose documented authority to act on the Data Subject's behalf.

### 5. POSTAL ADDRESS

After completing the application form, please check to ensure that all the information you have provided is accurate and all the required documents are enclosed.

Please return the application form to:

**University Secretary  
University of Worcester  
Worcester WR2 6AJ  
infoassurance@worc.ac.uk**