

## POLICY FOR THE USE OF CCTV AND OTHER SYSTEMS

### 1. Introduction

1.1 This policy explains the purpose, use, and management of the CCTV installations and other surveillance systems at the University of Worcester.

1.2 The objectives of the CCTV installations are:

- to promote a safe community environment;
- the protection of staff, students, visitors, and the assets of the University;
- the prevention, investigation and detection of crime and disciplinary offences in accordance with the University disciplinary procedures;
- 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.

1.3 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

1.4 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 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 260 cameras over three Sites:

- St Johns Campus
- 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 entrance exits
- Academic buildings
- Service buildings
- Bars & retail areas
- The Students' Union
- Residences

2.3 There are several types of camera –

- 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 behaviour
- 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 Director of Estates & Facilities 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 and Operations is responsible for the day to day management of the system

3.2.4 The Head of Governance & Regulatory Affairs 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 General Data Protection Regulation (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 Head of Governance & Regulatory Affairs ([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:
- Director of Estates and Facilities
  - Assistant Director of Security and Operations
  - Head of Security and Operations
  - Control Room Operators
  - Security Team Leaders
  - Head of Governance & Regulatory Affairs
  - 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 Head of Governance & Regulatory Affairs subject to the requirements of data protection legislation.

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

#### **6. Applications to review images**

- 6.1 University staff, students and other individuals using the University premises (e.g. visitors, contractors etc) may apply to have CCTV footage reviewed.
- 6.2 The request must be made in writing using the Application Form within [Appendix 1](#) and detail:
- The date, time and location
  - The reason for the request (which must comply with the purposes as laid out in 1.1 of this policy)
- 6.3 All requests should be made within 9 working days of the recording to ensure footage is not erased and submitted to the Head of Governance & Regulatory Affairs

## **7. Retention and disposal**

- 7.1 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](#)
- 7.2 At the end of their useful life all images on discs will be erased and securely disposed of.

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

- 8.1 Complaints received in relation to the use of the CCTV system should be made in the first instance to the Director of Estates and Facilities. Complaints will be acknowledged within 5 working days and a response will be made to the complainant within 20 working days.
- 8.2 Complaints in relation to the disclosure or image supply should be made in writing to the Head of Governance & Regulatory Affairs ([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.
- 8.3 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)

## **9. Relevant Policies**

[Data Protection Policy](#)  
[Data and Records Management Policy](#)  
[Information Security Policy](#)

<b>Owner</b>	Assistant Director Security and Operations
<b>Approved by</b>	Vice Chancellor's Executive Board
<b>Approval Date</b>	31 <sup>st</sup> October 2019
<b>Version</b>	1.2
<b>Review Date</b>	October 2021



## CCTV SUBJECT ACCESS REQUEST FORM

Under data protection legislation an individual has the right to request a copy of any personal information held about him/her by the University of Worcester, whether it is in hard copy, electronic or CCTV.

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.

1. PERSONAL DETAILS	
Applicant's full name:	
Applicant's postal address:	
Applicant's email address:	
2. INFORMATION REQUIRED	
<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 may also be 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 <input type="checkbox"/>	Viewing <input type="checkbox"/>
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### 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: i.e. photocopy of birth certificate, 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:

**Head of Governance & Regulatory Affairs**  
**University of Worcester**  
**Worcester**  
**WR2 6AJ**  
**infoassurance@worc.ac.uk**