



# CCTV Policy

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## 1. Purpose and Scope

- 1.1. Exeter College uses Close Circuit Television within all its premises. The purpose of this policy is to set out the position of the College as to the management, operation and use of the CCTV across the College.
- 1.2. This policy applies to all students, staff, visitors and contractors to the College and all other persons whose images may be captured by the CCTV system.
- 1.3. This policy takes account of all applicable legislation and guidance as set out under point 5 Associated Documentation.
- 1.4. This policy sets out the position of the College in relation to its use of CCTV.

## 2. Definitions

- 2.1. **The College** – Exeter College
- 2.2. **CCTV** – Close Circuit Television (including Body-worn Cameras)
- 2.3. **DPIA** – Data Privacy Impact Assessment

## 3. Policy

### 3.1. Purpose of CCTV

The College use CCTV for the following purposes

- 3.1.1 To provide a safe and secure environment for students, staff, visitors, and contractors
- 3.1.2 To prevent the loss of, or damage to the College assets and/or buildings
- 3.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

### 3.2. Description of system

Exeter College have several cameras in and outside of its buildings, and there is a range of movable and fixed cameras.

### 3.3. Siting of Cameras

3.3.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, students, visitors and contractors.

3.3.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The College will make all reasonable efforts to ensure that areas outside of the College premises and grounds are not recorded.

3.3.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

3.3.4 Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as changing rooms or toilets.

### 3.4. Data Privacy Impact Assessment

3.4.1 Prior to the installation or repositioning of any CCTV camera, or system, a DPIA will be conducted by the College to ensure that the proposed installation is compliant with legislation and ICO guidance. The

DPIA will be carried out by the College's Data Protection Officer in collaboration with the sponsor of this policy.

3.4.2 The College will adopt a privacy by design and default approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

### **3.5. Management and Access**

3.5.1 The CCTV system in the College and in each site will be managed by a member of the Estates Services Team.

3.5.2 Any allegations against College staff will be referred immediately to the Director of Estates & IT and only they will determine who needs to view the footage. Allegations against the College principal will be referred to the College Chief Executive Officer (CEO). Allegations against College staff will be referred to the College CEO. Allegations against the College CEO will be referred to the Chair of the College Board.

3.5.3 On a day-to-day basis the CCTV system will be operated by an individual with appropriate technical ability. This may be the Estates Team, IT or HoF/D depending on the structure at the College.

3.5.4 The viewing of live CCTV images will be restricted to the College leadership team, Estates management team, IT management team and others delegated by the Senior Leadership Team. In doing so they will ensure that the purposes of this policy are satisfied.

3.5.5 Recorded images which are stored by the CCTV system will be restricted as in 6.4. Relevant images may be shared with governing body panels reviewing exclusions, disciplinary matters or complaints.

3.5.6 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

3.5.7 The CCTV system is checked daily to ensure that it is operating effectively.

### **3.6. Storage and Retention of Images**

3.6.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

3.6.2 Recorded images are stored for a maximum of 30 days unless there is a specific purpose for which they are retained for a longer period.

3.6.3 The College will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

3.6.3.1 CCTV recording systems being located in restricted access areas;

3.6.3.2 The CCTV system being encrypted/password protected;

3.6.3.2 Restriction of the ability to make copies to specified members of staff

3.6.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the College.

### **3.7. Disclosure of Images to Data Subjects**

3.7.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation and has a right to request access to those images.

3.7.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the College's Data Protection Policy.

3.7.3 When such a request is made the appropriate individual with access to the CCTV footage (ref 6.4) will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

3.7.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The individual accessing the footage must take appropriate measures to ensure that the footage is restricted in this way.

3.7.5 If the footage contains images of other individuals then the College must consider whether:

3.7.5.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;

3.7.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or

3.7.5.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

3.7.6 A record must be kept, and held securely, of all disclosures which sets out:

3.7.6.1 When the request was made;

3.7.6.2 The process followed by to the individual with access to the CCTV footage in determining whether the images contained third parties;

3.7.6.3 The considerations as to whether to allow access to those images;

3.7.6.4 The individuals that were permitted to view the images and when; and

3.7.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

*Note that, when a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. There is reference here only to "access" as opposed to a "permanent copy" as the College may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However, if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.*

### **3.8. Disclosure of Images to Third Parties**

3.8.1 The College will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

3.8.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

3.8.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the individual with access to the CCTV footage must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third-party images.

3.8.4 The information above must be recorded in relation to any disclosure.

3.8.5 If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

### 3.9. Misuse of CCTV systems

The misuse of CCTV systems could constitute a criminal offence. All members of staff who breach this policy may be subject to disciplinary action.

### 3.10 Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by the College should be made in accordance with the College Complaints Procedure.

## 4. Associated Documentation

- 4.1. [UK General Data Protection Regulation \(UK GDPR\)](#)
- 4.2. [Data Protection Act 2018](#)
- 4.3. [CCTV Code of Practice](#)
- 4.4. Human Rights Act 1998
- 4.5. [Data Protection Policy](#)
- 4.6. [Privacy Notices](#)
- 4.7. [Information Governance Policy](#)
- 4.8. [Retention and Disposition Policy](#)
- 4.9. [Data Retention Schedule](#)
- 4.10. [Compliments Comments Complaints Procedure](#)

## 5. Monitoring, Reviews and Evaluation

- 5.1. The Senior Leadership team is responsible for the approving of the CCTV Policy.
- 5.2. The Board is responsible for adopting the CCTV Policy.
- 5.3. Exeter College is committed to complying with the law in respect of personal data and the protection of the rights and freedoms of individuals whose information it collects and processes.
- 5.4. The Director of Estates and ICT is responsible for the maintenance, review and monitoring of the CCTV Policy and will conduct a bi-annual review or earlier should the need arise.
- 5.5. The definitive version of the policy is stored in the [College Leadership SharePoint Site](#)