



CCTV Policy

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Consulted with: DPO, SLT

Next Review Date: June 2027

Version: June 2025

1. Purpose and Scope

- 1.1. Exeter College uses Close Circuit Television (CCTV) 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 4: 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** – Closed Circuit Television
- 2.3. **DPIA** – Data Protection Impact Assessment
- 2.4. **BWV** – Body Worn Video

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 has several cameras in and outside of its buildings, and there is a range of movable and fixed cameras. Additional technologies other than CCTV are Body Worn Video (BWV) cameras worn by the Estates Services (security) team.

3.3. Siting of CCTV 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 Protection Impact Assessment

- 3.4.1 Prior to the installation or repositioning of any CCTV camera, or system, a DPIA was conducted by the College to ensure that the proposed installation is compliant with legislation and ICO guidance (DPIA Reference Number 48). The process of using Body Worn Video Cameras is also listed on our ROPA.
- 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 Operation of the CCTV system in the College and in each site will be managed by a member of the Estates Services Team, identified Estates department personnel and members of CLT and SLT as Information Asset Owners (cf. Information Governance Policy).

3.5.2 Any allegations against college staff will be referred immediately to the Executive Director of Estates & Sustainability and only they will determine who needs to view the footage. Allegations against the College Principal & CEO will be referred to the College Deputy CEO and COO. Allegations against College staff will be referred to the College Deputy CEO and COO. Allegations against the College Deputy CEO and COO 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 must be the Estates Services Team and IT.

3.5.4 The viewing of live CCTV images will be restricted to the College leadership team (CLT), Estates Services and management team, IT management team and others delegated by the Senior Leadership Team (SLT). 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 3.7. 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. Body Worn Video (BWV)

3.6.1 A Data Protection Impact Assessment (DPIA) of BWV (Bodycams) has been conducted and addresses any impact on the rights and freedoms of individuals whose personal data are captured.

3.6.2 Sufficient privacy information is provided to individuals before we use BWV, such as clear signage, verbal announcements or lights/indicators on the device itself and have readily available privacy policies.

3.6.3 Staff using BWV are trained to inform individuals that recording may take place if it is not obvious to individuals in the circumstances.

3.6.4 The College has appropriate retention and disposal policies in place for any footage that we collect. Please cf. the college Data Retention Schedule.

3.6.5 Efficient governance procedures are in place to enable the College to retrieve stored footage and process it for subject access requests or onward disclosures where required.

3.6.6 Where necessary, the College has limited ability to effectively blur or mask footage, if redaction is required to protect the rights and freedoms of any third parties.

3.6.7 The College complies with the Surveillance Camera code of practice where required.

3.7. 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.

3.7.2 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.

3.7.3 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.

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

3.8. Disclosure of Images to Data Subjects

3.8.1 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.

3.8.2 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.

3.8.3 When such a request is made the appropriate individual with access to the CCTV footage (ref 3.5) will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

3.8.4 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.

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

3.8.5.1 -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;

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

3.8.5.3 -If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request (e.g. if the Police request the images for the detection or prevention of crime.)

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

3.8.6.1 -When the request was made;

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

3.8.6.3 -The considerations as to whether to allow access to those images;

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

3.8.6.5 -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.*

3.9. Disclosure of Images to Third Parties

3.9.1 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.

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

3.9.3 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.

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

3.9.5 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 (DPO) should be contacted in the first instance and appropriate legal advice may be required.

3.10. 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.

3.11. 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. [Surveillance Camera Code of Practice](#)
- 4.4. [Information Commissioners Office \(ICO\)](#)
- 4.5. [Human Rights Act 1998](#)
- 4.6. [Data Protection Policy](#)
- 4.7. [Privacy Notices](#)
- 4.8. [Information Governance Policy](#)
- 4.9. [Retention and Disposition Policy](#)
- 4.10 [Data Retention Schedule](#)
- 4.11 [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 Executive Director of Estates and Sustainability 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](#)