



BUCKINGHAMSHIRE
NEW UNIVERSITY

EST. 1891



CCTV Protocol

Contents

| | |
|---|----------|
| Introduction | 2 |
| Scope | 2 |
| Ownership and Operation of the CCTV System | 2 |
| Principles | 2 |
| Purpose of the CCTV System | 2 |
| System Details | 3 |
| Data Protection Act 1998 | 3 |
| Access to Information | 3 |
| Primary Requests to View Data | 4 |
| Third Parties | 4 |
| Public Information | 5 |
| Signage | 5 |
| Complaints | 5 |

Approved by: **N/A**
Version No. **1.0**
Owner: **Estates**

Date first published: **Oct-2015**
Date updated: **Oct-2015**
Review Date: **Sep-2021**

This document has been designed to be accessible for readers. However, should you require the document in an alternative format please contact the Academic Quality Directorate.

Introduction

- 1 The aim of this protocol is to ensure that the closed circuit television (CCTV) system of Buckinghamshire New University (the University) is used and managed in accordance with legal requirements for the protection of employees, students, guests and visitors. The protocol also ensures that the rights of privacy and data protection enshrined in law are protected.
- 2 The University is committed to the belief that everyone has the right to respect for his or her private and family life and their home.
- 3 The protocol for the use of the University CCTV is underpinned by security assignment instructions. The management of CCTV is owned by the Director of Estates, who provides oversight of CCTV operations through the contract provider (Bellrock FM) and any security services contracted to the University by them.
- 4 For the purposes of this protocol, and in relation to the management of CCTV images, the term 'Data Controller' refers to the University responsibility. Overall top-level authority for data control lies with the Deputy Vice-Chancellor.

Scope

- 5 This code of practice is binding on all employees and students of the University, all employees of contracted out services and applies to all other persons who may and for whatever reason be present on the University's property.

Ownership and Operation of the CCTV System

- 6 The CCTV system is operated by the security contractor, reporting to Bellrock FM who in turn report directly to the Director of Estates. The CCTV system, all recorded material and copyright is owned by the University.

Principles

- 7 The following principles will govern the operation of the CCTV system:
 - a The CCTV system will be operated fairly and lawfully and only for the purposes authorised by the University;
 - b The CCTV system will be operated with due regard for privacy of the individual;
 - c Any changes to the purposes for which the CCTV system is operated will require the prior approval of the Deputy Vice-Chancellor and will be publicised in advance.

Purpose of the CCTV System

- 8 The system is intended to provide an increased level of security in the University environment for the benefit of those who study, work, live in or visit the campus.

- 9 The CCTV system will be used to meet the following key objectives, which will be subject to annual assessment:
 - a To detect, prevent or reduce the incidence of crime;
 - b To prevent and respond effectively to all forms of harassment and public disorder;
 - c To improve communications and the operational response of security patrols in and around the areas where CCTV operates;
 - d To create a safer community;
 - e To gather evidence by a fair and accountable method;
 - f To provide emergency services assistance;
 - g To assist with health & safety.
- 10 As community confidence in the system is essential, all cameras will be operational and an appropriate maintenance program will be established.

System Details

- 11 The CCTV system consists of overt CCTV cameras situated on University property, which continuously record activities in that area. The control room is staffed 24-hours a day by qualified and Security Industry Authority (SIA) licensed staff working in shifts.

Data Protection Act 1998

- 12 The eight principles of the Data Protection Act 1998 will be adhered to and any future changes of legislation will be taken into account. The University will:
 - a Obtain and process personal data fairly and lawfully;
 - b Obtain, hold and use data only for the purposes specified;
 - c Use the data only for the purposes, and disclose only to the people, shown within these policies and procedures;
 - d Only hold data which is adequate, relevant and not excessive in relation to the purpose for which the data is held;
 - e Ensure personal data is accurate and, where necessary, kept up to date;
 - f Hold data for no longer than is necessary;
 - g Personal data will be processed in accordance with the rights of data subjects under the Data Protection Act 1998;
 - h Take security measures to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of information;
 - i Personal data will not be transferred outside the University without ensuring there is an adequate level of protection in relation to the processing of personal data.

Access to Information

- 13 The Freedom of Information Act 2000 and the Data Protection Act 1998 will be adhered to. Any request for disclosure of information must be made to the Director of Estates. Data and information shall be releasable to University Management and Investigations personnel when required for disciplinary, investigative or other processes on the authority of the Deputy Vice-Chancellor.

- 14 Requests for information by the Police and other authorities must be accompanied by the relevant Data Protection form duly signed by the appropriate authority and must also be made through the Director of Estates.
- 15 Access to the monitoring and recording facility will be prohibited except for lawful, proper and sufficient reasons (e.g. official visits from law enforcement or inspection agencies, security staff and senior management and cleaning staff) and only then with the personal authority (verbal or written) of the Deputy Vice-Chancellor or Director of Estates.
- 16 Regardless of their status, all visitors to the control room will be required to sign the visitor's book and a declaration of confidentiality.
- 17 Any other personnel admitted to the control room, such as cleaning staff or engineers effecting repairs must be authorised by the Duty Security Manager or deputy (verbally or in writing) and must be supervised at all times whilst they are in the control room.

Primary Requests to View Data

- 18 Primary requests (i.e. those from law enforcement agencies) to view data generated by the CCTV system are likely to be made by third parties for any one or more of the following purposes:
 - a Providing evidence in criminal proceedings (Police and Criminal Evidence Act 1984, Criminal Procedures & Investigations Act 1996);
 - b Providing evidence for civil proceedings or tribunals;
 - c The investigation and detection of crime;
 - d Identification of witnesses.

Third Parties

- 19 Third parties which should be required to show adequate grounds for disclosure of data within the above criteria, may include, but are not limited to:
 - a Police;
 - b Statutory authorities with powers to prosecute;
 - c Solicitors;
 - d Plaintiffs in civil proceedings;
 - e Accused persons or defendants in criminal proceedings.
- 20 Upon receipt of a bona fide request to verify the existence of relevant data the Director of Estates will contact the Bellrock FM Contract Manager or deputy who will ensure:
 - a No undue obstruction of any third party investigation to verify existence of data,
 - b The retention of data which may be relevant to a request,
 - c That there is no connection with any existing data held by the police in connection with the same investigation.

Public Information

- 21 A copy of this Protocol will be made available to anyone requesting it.

Signage

- 22 Signs will be placed in the locality of the cameras. The signs will indicate:
- a The presence of monitoring and recording;
 - b The ownership of the system;
 - c Contact telephone number.

Complaints

- 23 Any use of the CCTV system or materials produced which is outside this protocol and is inconsistent with the objectives of the system will be considered gross misconduct.
- 24 Misuse of the system will not be tolerated; continuing public support is vital. Any person found operating outside these codes without good and reasonable cause will be dealt with under the University disciplinary system. If any breach constitutes an offence under criminal or civil law then court proceedings may be taken.
- 25 Any complaint concerning misuse of the system will be treated seriously and investigated by the Director of Estates and or deputy and the Deputy Vice-Chancellor. They will ensure that every complaint is acknowledged in writing within seven working days which will include advice to the complainant of the enquiry procedure to be undertaken.
- 26 Where appropriate the Police will be asked to investigate any matter recorded by the CCTV system which is deemed to be of a criminal nature.