



**Worcester College  
Oxford**

## CCTV Policy

### Introduction

1. A Closed Circuit Television (CCTV) System is in place in Worcester College. This system, known as the 'CCTV System', comprises a number of cameras installed at strategic locations. All of the cameras are fully operational and recorded.
2. For the purpose of this policy, the 'Owner' of the system is Worcester College.
3. For the purposes of the Data Protection Act, the 'Data Controller' is Worcester College.
4. This policy will be subject to review annually to include consultation with interested parties.
5. Throughout this policy it is intended, as far as possible, to balance the objectives of the CCTV System with the need to safeguard the individual's rights. Every effort has been made throughout this policy to indicate that a formal structure has been put in to place, including a complaints procedure.

### Objective of this policy

6. The objective of this policy is to ensure that the CCTV system used at Worcester College, Oxford, is operated in compliance with data protection legislation (including the UK GDPR and Data Protection Act 2018), and in accordance with legal requirements including the CCTV Code of Practice issued by the Information Commissioner's Office and Article 8 of the Human Rights Act 1998 – Respect for Private and Family Life.

### Purposes of the CCTV system

The purposes of the CCTV System which form the lawful bases for the processing of data are:

7. To protect Worcester College buildings and its assets.
8. To protect the health and safety of College members and visitors.
9. To increase personal safety and reduce the fear of crime.
10. To detect, prevent and reduce incidence of property crime, public disorder and offences against people.
11. To support the police in a bid to deter and detect crime, identify, apprehend and prosecute offenders.
12. To protect members of the public and private property.

### Principles

13. The CCTV System is operated in accordance with the data protection legislation and the Information Commissioner's CCTV Code of Practice at all times.
14. The CCTV System is operated in accordance with all the requirements and the principles of the Human Rights Act 1998.
15. The CCTV System is operated fairly, within the law, and only for the purposes for which it was established and are identified within this policy.

## **Key Personnel and Responsibilities**

16. The Home Bursar is the overall manager of the CCTV System and the person responsible for ensuring the objectives and principles set out in this policy are upheld.
17. The Head Porter has day-to-day responsibility for the monitoring, operation and evaluation of the CCTV System and the implementation of this policy. The Head Porter is responsible for maintaining full management information as to the incidents dealt with in the management of the CCTV System.
18. The Head of ICT provides day-to-day IT support for the CCTV system.
19. The College's Data Protection Officer (DPO) is responsible for monitoring internal compliance with data protection legislation, advising on the College's data protection obligations, and acting as a point of contact for individuals and the ICO.

## **Cameras and Area Coverage**

20. The areas covered by CCTV to which this policy refers are the buildings and grounds of Worcester College, including the entrances to 171 & 172 Walton Street.
21. Unless an immediate response to events is required, authorised CCTV operators are instructed not to direct cameras at an individual, their property or a specific group of individuals, without authorisation from the Home Bursar or Head Porter.
22. None of the cameras forming part of the system are installed in a covert manner. Some cameras may be enclosed within 'All weather domes' for aesthetic or operational reasons.
23. The system is not capable of audio recording.

## **Monitoring Equipment**

24. A monitor is installed behind the counter in the Lodge. The equipment has the capability of monitoring all cameras simultaneously throughout every 24-hour period.
25. The CCTV System records the images from all cameras in real time.
26. Access to the cameras, operating controls, recording and reviewing equipment is strictly limited to:
  - a. Authorised and trained Lodge staff during working hours.
  - b. The Home Bursar .
  - c. The Head Porter
  - d. Members of the ICT Department for IT support to the system.
27. Any authorised person operating the cameras acts with utmost integrity at all times.
28. Any replay of pre-recorded data is only undertaken in the following areas:
  - a. Head Porter's office
  - b. The lodge only if the area is free from all bar the trained lodge staff
  - c. IT Office where the server is kept.

There must be a good reason for the viewing. A log of the playback is retained on file by the Head Porter, together with details of the purpose and those present at the viewing.

29. Access to pre-recorded data is strictly limited to:
  - a. Head Porter and Lodge staff.
  - b. The Home Bursar.
  - c. IT staff.
  - d. College, or other officials, by way of a written request. All College requests should be made using the form available through the 'Submit Ticket' link here:  
<https://support.worc.ox.ac.uk/en>.

30. Unauthorised persons do not have access to any part of the CCTV System without the authorisation of the Home Bursar, or, in their absence and in the following order, 1) the Finance and Estates Bursar, and 2) the Vice-Provost.
31. All CCTV operators receive training relevant to their role. Further training is provided as necessary.

### **Privacy and Data Protection**

32. All personal data obtained by virtue of the system, are processed fairly and lawfully and, in particular, are only to be processed in the exercise of achieving the stated purposes of the CCTV System. In processing personal data, there is total respect for everyone's right to privacy.
33. The storage and security of the data will be strictly in accordance with the requirements of the General Data Protection Regulation and data protection legislation, the Information Commissioner's Code of Practice and the College's Data Protection Policy, details of which can be found at <https://www.worc.ox.ac.uk/privacy>.
34. All data is processed in accordance with the principles of the General Data Protection Regulation and in-line with the College's Data Protection Policy which can be found at <https://www.worc.ox.ac.uk/privacy>.
35. Security measures are in place to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of information.

### **Operation of the System by a Law Enforcement Agency**

36. Under certain circumstances law enforcement agencies may make a request to assume direction of the CCTV System. Only written requests made under Article 23(1) of the UK GDPR and Schedule 2 of the Data Protection Act 2018 will be considered. Any such request will only be accommodated on the authority of the Home Bursar or Head Porter.
37. In the event of such a request being permitted, only those CCTV operators who are authorised to do so will operate the CCTV System under the direction of the law enforcement officer.

### **Maintenance of the CCTV System**

38. Provision is made for regular/periodic service checks of the CCTV equipment, which includes cleaning of any all-weather domes or housings, checks on the functioning of the equipment, and any minor adjustments that need to be made to the equipment settings to maintain picture quality.
39. The ICT Department takes full responsibility for all technical hardware aspects of the CCTV system. Should a fault develop all cameras, servers, switches and computers have maintenance and warranty agreements in place.
40. The Head Porter will maintain appropriate records in respect of the functioning and maintenance of the cameras.

### **Handling of recorded material**

41. For the purposes of this policy 'recorded material' means any material recorded by, or as the result of, technical equipment which forms part of the CCTV system, but specifically includes images recorded digitally, on hard drive and by way of DVD copying, including digital video prints.
42. Subject to the equipment functioning correctly, images from the cameras are recorded throughout every 24-hour period.
43. Recorded footage is retained for a period of up to 21 days. Images captured for College, police, or other investigations will need to be held for as long as is necessary for the purposes of the investigation.

44. Every digital recording obtained by using the CCTV System has the potential of containing recorded material, which may have to be admitted in evidence at some point during its life span. Irrespective of the format (e.g. DVD, paper copy, etc.), images obtained from the CCTV system are treated strictly in accordance with this policy from the moment they are received until their final destruction.
45. Access to, and the use of, recorded material is strictly for the purposes defined in this policy.
46. Recorded material is not copied, sold, or used for commercial purposes or the provision of entertainment.
47. In complying with data protection legislation, it is intended, as far as reasonably practicable, to safeguard individual rights to privacy and to give effect to the following principles:
  - a. Recorded material shall be processed lawfully and fairly, and used only for the purposes defined in this policy.
  - b. Access to recorded material will only take place in accordance with the procedures outlined in this policy.
  - c. The release or disclosure of data for commercial or entertainment purposes is specifically prohibited.
  - d. Members of the police service or other agencies having a statutory authority to investigate and/or prosecute offences may release details of recorded information to the media only in an effort to identify alleged offenders or potential witnesses. Under such circumstances, full details will be recorded.
48. It may be beneficial to make use of 'real' digital recordings for the training and education of those involved in the operation and management of CCTV systems, and for those involved in the investigation, prevention, and detection of crime. Any material recorded by virtue of the CCTV system is only used for such training and education purposes.
49. A video print is a copy of an image or images, which already exists on a hard drive or DVD. Video prints are not taken as a matter of routine. The Home Bursar or, in his or her absence, the Finance and Estates Bursar, or, in their absence, the Vice Provost, must authorise any requests to make video prints from the CCTV System. There must be a good reason for the request. If a video print is made, the purpose of the request is recorded. The record will include brief details of the nature of the incident together with the location, time and date.
50. If a video print is required in connection with a criminal investigation, it is treated as an exhibit and dealt with in accordance with the rules of evidence in respect of continuity, disclosure, etc.

### **Copyright**

51. Copyright and ownership of all material recorded by virtue of the CCTV System remains with the Data Controller.

### **Access to 'Personal Data'**

52. Data protection legislation provides Data Subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Requests for access should be made in writing to the College's Data Protection Officer [dataprotection@worc.ox.ac.uk](mailto:dataprotection@worc.ox.ac.uk); Data Protection Officer, Worcester College, Walton Street, Oxford, OX1 2HB.

### **Public Information**

53. A copy of this policy is available on the College Website.
54. Warning signs are in place at access routes to College areas covered by the CCTV system. The signs indicate the presence of 24-hour CCTV monitoring.

## Complaints

55. Any complaints about the College's CCTV System should be addressed to the Home Bursar.

## Breaches of this policy

56. Any breach of this policy is initially investigated by the Home Bursar, in order for the appropriate action to be taken.

Data Protection Officer

March 2024

Version	Date	Author	Rationale
1.0	May 2015	Domestic Bursar	
2.0	October 2021	Richard Noonan (Head of Works); David Roche (Head of Security and Fire Safety); Mark Bainbridge (Data Protection Officer)	Revision to take account of updated data protection obligations and new Bursary structure Approved at GB, 27/10/2021
2.1	November 2023	Mark Bainbridge	Revisions to take into account new distribution of responsibilities to Head Porter
2.2	March 2024	Mark Bainbridge	Clarifying how requests to access pre-recorded material can be authorised.

Last reviewed: March 2024

Next due for review: November 2024