

# CCTV Policy





# CCTV

## Introduction

This policy details the operating policy and standards for the surveillance systems installed and operated by Keele SU in compliance with General Data Protection Regulations. This includes CCTV, BWV and Dash Cams. This policy should be read in conjunction with Keele SU's Data Protection & Information Security Policy and the Keele SU Data Privacy Statements.

## Definitions

- Keele SU refers to Keele University Students' Union (the Data Controller)
- CCTV is the closed circuit television system in use in the Keele SU premises.
- BWV is the body worn CCTV system in use by designated licensed security personnel employed or contracted in by Keele SU.
- Dash Cam is the vehicle mounted CCTV system in use on Keele SU vehicles.
- ICO is the Information Commissioner's Office



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## Ownership & Operation

1. The CCTV system is owned by Keele University Students' Union and managed by the Students' Union and its appointed agents. Under the Data Protection Act 2018, Keele University Students' Union is the 'Data Controller' for the images produced by the CCTV system. The Students' Union is registered with the Information Commissioner's Office and the registration number is ZA089895.
2. Keele SU must ensure that all CCTV policies and procedures comply with the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA), as CCTV images can be personal data. All CCTV policies and procedure must also comply with the Information Commissioners Office (ICO) Code of Conduct and the Surveillance Camera Commissioners Code of Practice.
3. The Projects & IT Manager is responsible for the overall management, operation and maintenance of the CCTV System, and ensures compliance with this policy.

## Purposes

1. Keele University Students' Unions CCTV system is in place for the purposes of;
  - Deterring crime and disorder.
  - Assisting with the detection of crime and disorder.
  - Assisting with the identification, apprehension and prosecution of offenders.
  - Providing evidence for internal disciplinary hearings.
2. It is also a condition of Keele SUs' Premises Licence (Newcastle-Under-Lyme 003276) that CCTV is installed, maintained, operational 24 hours a day and covers all areas of the licenced premises.






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## Principles

The following principles will govern the operation of the CCTV system:

1. Systems will be operated lawfully and only for the purposes set out in this policy and in accordance with the Data Protection Act.
2. To ensure compliance with the Data Protection Act, personal data, which includes biometric data recorded on all CCTV systems, will at all times be processed in line with GDPR principles. These principles require that data shall be:
  - a. Processed lawfully, fairly and in a transparent manner
  - b. Collected only for specified, explicit and legitimate purposes and not processed in a manner that is incompatible with those purposes
  - c. Adequate, relevant and limited to what is necessary, in relation to the purposes of processing
  - d. Accurate and kept up to date, where necessary, with all reasonable steps taken to ensure inaccurate data is rectified without delay
  - e. Kept only for the period necessary for processing
  - f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing, and accidental loss, destruction or damage

## System Details

1. The CCTV system comprises of visible cameras situated in various locations around Keele SU premises, which continuously record activities in these areas. The images are stored on Digital Video Recorders secured locally in restricted areas and are only accessible by delegated staff with password-controlled access.
  2. The BWV system comprises of visible cameras attached to key personnel employed by, or contracted in by Keele SU, which records activities when activated by the person. This system works in partnership with the CCTV system to continuously record activities during defined licensed operating hours.
  3. The Dash Cam system comprises of visible cameras attached to the windscreen of the vehicles operated by Keele SU, and continuously records activities in and around these vehicles when operated by Keele SU as the Safety Bus Service.
  4. The images for both BWV and Dash Cam are stored on an encrypted hard drive and secured centrally in the Keele SU Duty Managers Office and are only accessible by delegated staff with password-controlled access.
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## Operating Standards

1. In accordance with the Data Protection Act 2018 and Keele SU's Premises Licence, signage is located at all entrances to the Keele SU building and those operating BWV will be defined within the premises event management procedures and will communicate with subjects informing individuals that cameras are in operation. They may also wear signs informing individuals that cameras are in operation. These signs will indicate:
  - The presence of video recording equipment.
  - The purpose of such video recording equipment.
  - The ownership of the system.
  - A contact e-mail address for the system.
2. Cameras should not be hidden from view.
3. It is imperative that access to, and security of, images is managed with the requirements of GDPR and the Data Protection Act 2018. At all times the following standards will apply:
  - a. Surveillance recording and other materials produced from them will not be retained for longer than necessary. Data storage is automatically managed by the CCTV digital records which uses software programmed to overwrite historical data in chronological order. This process produces an approximate 31 day cycle as required by Keele SU's Premises Licence.
  - b. Provided that there is not legitimate or legal reason for retaining the CCTV images, the images will be erased following the expiration of the retention period.
  - c. Where further investigation may be required data will be retained beyond the retention period and will be stored in a secure place to which access is controlled. Data will be erased when the purposes for processing have been met.
  - d. The ability to view live and historical CCTV data is only provided at designated locations and to authorised persons only.
  - e. Except where a request has been granted for third party access to certain specified surveillance images, images are not to be displayed in the presence of any unauthorised person. For the purposes of viewing CCTV images, an authorised person is defined as an employee or appointed person acting on behalf of Keele SU who has operational responsibility for either the prevention, investigation and detection of crime and/or the monitoring of the security and safety of the Keele SU premises.





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## Disclosure of Footage to 3rd Parties

1. As per Keele SU's Premises Licence, access should be allowed immediately to the police, Trading Standard or Local Authority Officers in accordance with the Data Protection Act 2018, where it is necessary to do so for the purposes of;
  - Prevention of crime and disorder.
  - Prosecution or apprehension of offenders.
  - Disclosure being required by law.
2. Keele SU has a data sharing agreement with Keele University which allows for the transfer of data between the parties for the purposes of university investigations.
3. Any request made by the parties above, should be made using a CCTV Footage Request Form which can be sent upon request via email to [su.security@keele.ac.uk](mailto:su.security@keele.ac.uk). This should then be submitted to the same address for review and decision regarding the appropriateness of releasing data.

## Disclosure of Footage to Data Subjects

1. Data subjects have a right to make a data subject access request. To make a data subject access request, the individual should complete the form on the Keele SU website. Proof of identification will be needed before the request can be processed.
  2. Keele SU will respond to a request within a period of 30 days from the date it is received.
  3. If a subject access request is manifestly unfounded or excessive, Keele SU is not obliged to comply with it. If an individual submits a request that is unfounded or excessive, the organisation will notify them that this is the case and whether it will respond or not.
  4. Where a data subject request access to recording believed to contain their personal data, the data set requested will be reviewed. Should the personal data of any other individual be contained within the data set request then access will not be permitted.
  5. Keele SU has the right to refuse a Subject Access Request where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders. If a Subject Access Request is refused the reasons will be fully documented.
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