

TITLE:

CCTV (Closed Circuit Television System) SOP

Summary of Contents:

In compliance with the Data Protection Act (1998), the ICO CCTV Code of Practice and the College's Data Protection Policy, this Standard Operating Procedure (SOP) provides staff, students and visitors with information, guidance and procedures in relation to the College use of CCTV and its disclosure within controlled conditions.

Date Created:
October 2013

Latest CMT Approval Date:
31 May 2016

Responsible Owner:

Information Officer

REVIEW INFORMATION

Created: October 2013
Reviewed: November 2014
May 2016

Next Review Due: May 2018

Requires CMT Approval (yes/no):
Nov 2014: No
May 2016: Yes

Previous Reference (for control purposes):

N/A

1.0 PURPOSE

- 1.1 SERC operates a Closed Circuit Television system (CCTV) on all main campuses i.e. Bangor, Ards, SPACE, Lisburn, Downpatrick, Ballynahinch and Newcastle, to provide staff, students and visitors with a safe environment and also to protect College property against criminal damage.
- 1.2 The use of CCTV is regulated by the Data Protection Act (1998) as its usual purpose is to record the activity of individuals and/or information relating to them e.g. car registration plate.
- 1.3 SERC is registered with the Information Commissioners Office to process personal data, Notification Number Z6477199.
- 1.4 The purpose of this Standard Operating Procedure (SOP) is to outline the Colleges approach to using CCTV and how we will comply with the Data Protection Act (1998) and the CCTV Code of Practice. This procedure is not applicable to targeted surveillance activity. This is regulated by the Regulation of Investigatory Powers Act (2000).
- 1.5 All staff, students and visitors should have a reasonable expectation of being captured on CCTV on a daily basis.
- 1.6 While the use of CCTV is primarily for the following purposes, the College will regulate its use so as not to become intrusive:
 - Deterring, prevention and detection of a crime including misuse/abuse of SERC equipment.
 - Identification, apprehension and prosecution of offenders.
 - Security of campus buildings and ground.
 - Safeguarding/Health and Safety
- 1.7 In exceptional circumstances the images may be viewed to clarify student/staff misconduct for investigatory purposes. This will only be carried out with the explicit permission from Human Resources, Campus/Duty Manager, member of CMT.

2.0 SCOPE

- 2.1 This Procedure applies to all SERC staff, students, contractors, visitors and members of the public who may be captured on CCTV.

3.0 OWNERSHIP OF IMAGES

- 3.1 As the data controller, SERC owns all images captured on its CCTV surveillance system.
- 3.2 Access to footage on these sites is controlled by the Records Manager who is also the primary contact for CCTV in the Bangor/Ards and SPACE campuses.
- 3.3 The Records Manager processes images in line with the SERC 'CCTV SOP' and does not permit anyone to view these images unless the individuals' role is clearly identified in Section 6.10 of this SOP.

- 3.4 All CCTV systems in the Bangor/Ards/SPACE campuses are maintained by the Estates Department who will retain access to footage for limited purposes and emergency.
- 3.5 Graham FM are CCTV data processors for the PPP premises i.e. Lisburn, Downpatrick, Ballynahinch and Newcastle. Graham FM process images in line with the SERC 'CCTV SOP' and do not permit anyone to view these images unless the individuals' role is clearly identified in Section 6.10 of this SOP.
- 3.5 **SERC is ultimately responsible for all recorded images, how it will be used and to whom it can be disclosed.**

4.0 OVERVIEW

- 4.1 The CCTV system operates 24 hours a day, 7 days a week.
- 4.2 Equipment used, image quality, camera siting and locations are appropriate to ensure that the images are adequate for the purpose for which they are being collected.
- 4.3 To raise awareness of the use of CCTV on College premises, signs are placed at all entrances to inform staff, students, contractors and visitors that they are entering a zone where CCTV is in operation. All signs stipulate the purpose of the CCTV surveillance and a contact number should any person want further information regarding the system.
- 4.4 If there is cause for CCTV to be installed in an area where there would be a heightened expectation of privacy e.g. rest rooms, signs will be prominently placed to clearly inform individuals of the presence of CCTV surveillance. Such occasions will only be necessary if there is suspicion of activity which will be reported to the Police.
- 4.5 Conversations will not be recorded on any camera. Cameras are solely to monitor and record the movements and actions of individuals.
- 4.6 The positioning of the CCTV system is planned to ensure maximum effectiveness and efficiency however the College cannot guarantee that all incidents will be detected.
- 4.7 CCTV systems on the Bangor/Ards/SPACE Campuses are serviced on an annual basis. CCTV systems on the Lisburn/Downpatrick/Ballynahinch/Newcastle campuses are serviced biannually.

5.0 ACCESS TO IMAGES AND SECURITY

- 5.1 Access to CCTV images is restricted to those staff authorised to do so in accordance with the purposes of the system.

Bangor/Ards/SPACE Campuses

Staff authorised to access the CCTV system and search for extracts of footage is restricted to the Records Manager and designated appointees who have been trained in the use of the system:

- 1) Head of Knowledge Management
- 2) Head of ICT Infrastructure
- 3) Estates Office

5.3 PPP Campuses

Staff authorised to access the CCTV system and search for extracts of footage is restricted to Graham FM managers and their designated appointees.

5.4 All monitors which display images captured on CCTV are password protected and only accessible by the Records Manager/designated appointees (Bangor/Ards/SPACE campuses) and the Graham FM managers/designated appointees (Lisburn/Downpatrick/Ballynahinch/Newcastle campuses).

6.0 **VIEWING AND DISCLOSURE OF CCTV FOOTAGE**

6.1 Disclosure of images from the CCTV system is controlled and is consistent with the purpose for which the system was established. See Section 1.6

6.2 Permission to view CCTV footage will not be granted to anyone whose role is not explicitly identified in this procedure. See section 6.10.

6.3 Urgent requests will be processed as soon as possible i.e. where there is immediate risk to health and safety or where a crime has been suspected.

6.4 Non-urgent requests will be processed within 5 working days.

6.5 All requests in relation to the Bangor/Ards/SPACE campuses must be made to those identified in Section 5.2 of this SOP.

6.6 Requests in relation to the Lisburn/Downpatrick/Ballynahinch/Newcastle campuses must be made to Graham FM Managers or their appointees.

6.7 Requests should include:

1. Date and time the images were recorded
2. Information to identify the individual, if necessary
3. Location of the camera, if known.

6.8 All occasions of CCTV footage being viewed/released must be documented (see appendix 1) and forwarded to the Records Manager at Bangor Campus.

6.9 CCTV recordings will be viewed in a closed area by the appointed personnel only unless they explicitly give permission for another individual to be there, however their presence must be in relation to the content of the images e.g. to identify an individual.

6.10 Individuals permitted to request and view CCTV material on any campus are:

SERC Personnel

- College Management Team
- Campus/Duty Managers
- Deputy Head of HR
- HR Business Partners
- Investigating Officers
- Head of Estates/Facilities Manager/Senior Projects Manager
- Head of Unit
- Head of School
- Head of Health and Safety
- Records Manager
- Programme Managers (TFS)

6.11 Releasing CCTV Footage

The College may receive requests for 'copies' of images captured on the CCTV system from individuals/external organisations.

The Records Manager will consider these requests for all campuses in line with the purpose of the CCTV system and the Data Protection Act (1998). In relation to requests from GFM, the Records Manager will liaise with the relevant manager to obtain the footage and review.

Where footage is being released, it must be encrypted prior to release regardless of format i.e. disc or email.

Again, Appendix 1 must be completed and retained by the Records Manager

6.12 Law Enforcement

Should the College receive a request from any law enforcement agency, the Records Manager/Graham FM/nominee may review and release the CCTV images where the content may assist with detection/prevention of a crime/terrorism.

Such agencies must provide proof of legitimacy for their request e.g. PSNI should provide a Form 81 with proof of permission to seek the footage.

6.13 Data Subject requests

The Data Protection Act (1998) gives individuals the right to access personal data held in relation to them by the College, this includes CCTV images. All Subject Access Requests must be made in compliance with the College Data Protection Policy. The Records Manager/Graham FM will arrange to view the images to assess if the release of the footage would evoke an exemption within the Data Protection Act (1998).

6.14 Third Party requests

Requests for CCTV images from third parties e.g. solicitors must be referred to the Records Manager/Graham FM who will arrange to view the images to assess if the release of the footage would evoke an exemption within the Data Protection Act (1998).

6.15 Safeguarding

Requests in relation to a safeguarding incident supersede this SOP. Requests may be made by any member of staff in an emergency on any campus.

Staff should contact those staff named in Sections 5.2 and 5.3 of this SOP and efforts immediately made to assist the enquiry.

Staff who have access to the CCTV systems must comply with requests immediately.

7.0 RETENTION AND DISPOSAL

All College CCTV images will be retained for a maximum of 30 days unless the College is made known of images which may assist with an investigation of an incident/crime. In such cases, the College will extract the relevant footage and retain until the investigation and any subsequent appeals are complete after which it will be securely disposed of.

8.0 COMMUNICATION PLAN

This procedure will be placed on the College intranet. Staff and students will be made aware of their responsibilities during induction. Signage will also be displayed on all campuses to inform students, staff and the public of the presence of CCTV surveillance.

9.0 REVIEW

This procedure will be reviewed (and if necessary updated) biannually or sooner if required to reflect changes in legislation or circumstance.

CCTV VIEWING RECORD

The use of CCTV by any organisation is regulated by the Data Protection Act (1998) as it is used to record activity of individuals and/or information relating to them e.g. car registration plate. This form must be completed by all persons at the point of viewing CCTV footage.

***Please note – access to CCTV material is solely restricted to the following personnel:**

- College Management Team
- Campus/Duty Managers
- Deputy Head of HR
- HR Business Partners
- Investigating Officers
- Head of Estates/Facilities Manager/Senior Projects Manager
- Head of Unit
- Head of School
- Head of Health and Safety
- Records Manager
- Programme Managers (TFS)

Name / Contact Details (primary requester)

Name: _____

Job title: _____

Department: _____

Contact number: _____

CCTV Details

Please detail the purpose for your request to view extracts of CCTV including dates and times of footage to be examined.

Has CCTV material been released into your custody?

Yes

No

Date footage recorded: _____

Time footage recorded: _____

Camera location: _____

Please note, once CCTV material is released into your custody, you undertake the responsibility of Data Controller and are responsible for its security and disclosure thereafter.

Signature: _____ **Date:** _____

(Viewer)

Signature: _____ **Date:** _____

(Viewer)

Signature: _____ **Date:** _____

(Viewer)

Signature: _____ **Date:** _____

(Records Manager)