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| **Policy title** | Use and Control of **Closed Circuit Television (CCTV)** |
| **Version number** | V 6.0 |
| **Effective from date** | July 2024 |
| **Applicable to** | Ipswich Campus |
| **Owner** | Director of Estates |
| **Date EIA completed** |  |
| **Approving Committee(s)** |  |
| **Date of approval** |  |
| **Review date** | April 2026 |

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| **Plan Number** | **UOS 700-09** |
| **Plan Name** | **Use and Control of CCTV** |
| **Plan Owner** | **Director of Estates** |
| **Plan Version** | **V 6.0** |
| **Plan Review Date** | **April 2025** |

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| **Introduction**  This document outlines the policy for the use and control of CCTV for the benefit and protection of all staff, students, contractors, and visitors or members of the public to the University of Suffolk Ipswich campus. This also applies to all other persons who may be present on the University of Suffolk campus in Ipswich, Suffolk.  The University has installed a CCTV surveillance system, which operates across the University. Cameras have been installed in all key areas of the Campus including indoor spaces, outdoor spaces and car parks. They also cover the infrastructure between James Hehir building, Athena Hall (student residence, privately managed) apart from the Athen Hall gym and Sir Thomas Slade Court.  Cameras have been sited so that they cover vulnerable areas and monitor fire escape routes.  Body worn CCTV is also used by licensed security members of staff contracted to the University, to ensure a secure and safe environment for operators whilst undertaking their duties which include addressing any abuse, violence and anti-social behaviour.  All the CCTV on Ipswich Campus is monitored by the licensed security Man Guarding Company contracted to the University of Suffolk.  The Security policy which relates can be found under reference number 700-05. |

**University Of Suffolk**

**Policy for the use and control of Closed Circuit Television (CCTV)**

CCTV has been installed across the Ipswich campus for the purposes of crime prevention and protection of the people, property and possessions of the University of Suffolk. It also covers the infrastructure between James Hehir building, Athena Hall (student residence, privately managed), Athena Hall gym and Sir Thomas Slade Court.

Cameras have been sited so that they cover vulnerable areas and monitor fire escape routes. All the CCTV on the Ipswich Campus is monitored by a Security Industry Authority (SIA) (hereafter referred to as ‘System’) licensed security company contracted to the University of Suffolk.

**Ownership**

It is the University’s responsibility as Data Controller to ensure the compliance with this policy along with its responsibilities under the relevant legislation, regulatory requirements, and statutory obligations. It is also the University’s responsibility to notify persons entering areas monitored by the System that a CCTV system is in operation, using clear signage.

**Contact Information**

Director of Estates

University of Suffolk, IP4 1QJ

Email: [fmhelpdesk@uos.ac.uk](mailto:fmhelpdesk@uos.ac.uk)

Data Protection Officer

University of Suffolk, IP4 1QJ

Email: [datagovernance@uos.ac.uk](mailto:datagovernance@uos.ac.uk)

Any queries in relation to this policy or the operation of the CCTV system should be directed to the Director of Estates.

**Complaints**

Any complaints regarding the operation of the CCTV system should be directed to the Director of Estates who will ensure that they are dealt with under the terms of the University’s internal complaints procedure.

**Responsibilities**

It is the responsibility of the Director of Estates to ensure the CCTV system and Body Worn cameras comply with data protection legislation. It is also their responsibility that cameras should only be sited in locations that have a need for such surveillance. They must also ensure the management of the image and data retention, security and viewing by authorised persons.

**Code of Practice for Operation of CCTV**

The University operates a range of cameras across the University which are fixed in addition to body-worn CCTV. Body worn CCTV, with audio, is used by licenced contracted members of security staff to ensure a secure and safe environment for operators undertaking their duties to address abuse, violence and anti-social behaviour.

This policy has been created for both the operators of the CCTV system and any member of the University community using University facilities. Its purpose is to ensure that the CCTV system is used to create a safer environment for staff, students, contractors, visitors and members of the public to the University, consistent with the obligations on the University imposed by the Data Protection Act 2018, General Data Protection Regulation (GDPR) (and associated regulations).

The Code of Practice for operation of the CCTV system are: -

1. The CCTV system is provided for the benefit and protection of all campus users be they staff, students, visitors or contractors and for the University as a whole.
2. CCTV will be used for the protection of people subject to harassment or intimidation, monitoring of vehicle and pedestrian traffic, prevention of crime and the maintenance of good order in the University. It may also be used to investigate complaints and to assist in criminal police proceedings. Whereas the CCTV system is in place for all these purposes the University will not always be monitoring all of these purposes all the time.
3. The System will be always operated under the supervision of a Security Officer. The System is tested daily with faults reported to the University Estates team immediately. The Head of Facilities and Estate Management is responsible for ensuring that operation of CCTV system complies with the CCTV code of practice issued by the Information Commissioner’s Office (ICO).
4. The System will only be used in a manner which is fair and lawful to all staff, students, visitors, contractors and to anyone on university property. It will be operated with due regard for the privacy of the individuals whose images have been captured.
5. The recorded material shall not be used or disclosed for any purpose, which is incompatible with this policy.
6. The recording medium will be erased after approx.30 days unless required as evidence in a Police investigation, internal disciplinary or civil proceedings.
7. Any individual whose personal data is held by the University in the form of a CCTV recording can request access to that recording by contacting the Data Protection Officer. Please see section on the Right of Access.
8. The University may release recordings to the Police or other persons for the purposes of the prevention or detection of crime, the apprehension or prosecution of offenders, or in the interests of National security, or in circumstances where the University is legally obliged to do, or in accordance with the specified purposes of the CCTV system. The identity of individuals on the recordings not relevant to the investigation or the request for access will be obscured by licenced CCTV and access control suppliers and contractors unless the individuals have given their consent. The identity of individuals on the recording whose presence is relevant to the investigation or request for access will be disclosed if they give consent for this. Access may also be disclosed if this consent is refused, when approved by the Data Protection Officer.
9. In the context of data relating only to the Athena Hall residence, authority to release information must be obtained from the University Data Protection Officer unless ordered to be released under statutory powers. Within the general context of this policy, recordings will normally be released to Athena Hall following application by the University Data Protection Officer or the deputy the Director of Estates.
10. Live viewing of the system or reviewing of recorded material prior to the production of specific recordings under points 6 -8 above, for the purposes set out in point 2 by appropriate staff of the University, security and others including the Police will be permitted. In these circumstances it will not be possible to obscure the identity of persons not relevant to the investigation. Under no circumstances will victims/complainants be permitted to view material in this form.
11. Covert monitoring or recording of images by fixed or temporary cameras will be undertaken only for the purposes of protection of individuals where there is a suspicion of harassment of those individuals, for the prevention or detection of crime and on the written permission of the following persons unless required to do so for national security or to comply with any regulatory requirements. All actions are logged in the daily report, with times and dates included.
12. The legal basis for processing under data protection legislation are vital interests of the data subject; processing carried out in the public interest; and the legitimate interests of the Data Controller
13. The system will not be operated for any personal or financial gain by any individual or the University.

NB. The Chief Operating Officer may authorise any recording or series of recordings.

**Signage**

Effort has been made to inform staff, students, contractors, visitors and members of the public of CCTV areas of coverage through signage. Signs are placed across the Ipswich campus, including the infrastructure between James Hehir building, Athena Hall (student residence, privately managed) and Sir Thomas Slade Court.

These signs provide information about the presence of CCTV and its ownership, in line with the ICO requirements.

**The Right of Access**

The UK GDPR gives individuals the right to access and receive a copy of their personal data. This is commonly referred to as a Subject Access Request or a SAR. Requests of this nature can be made to the University Data Protection Officer at datagovernance@uos.ac.uk.

Recordings will be released in copy form and on the authority of the Director of Estates, the Chief Operating Officer and/or the Data Protection Officer. The identity of third parties on the recordings will be obscured, unless the individuals have given their consent, see point 8 of the Code of Practice for operation of the CCTV system above.

Appendix 1

**Resources**

[ICO CCTV and Video Surveillance](https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/)

[University of Suffolk Data Management Policy](https://www.uos.ac.uk/media/uniofsuffolk/website/content-assets/documents/policies-and-procedures/Data-Management-Policy.pdf)

[University of Suffolk Data Security Policy](https://www.uos.ac.uk/media/uniofsuffolk/website/content-assets/documents/policies-and-procedures/Data-Security-Policy.pdf)