Pembroke College, Oxford.

CCTV Policy, Standards and Procedures.

Policy.

Pembroke College seeks to ensure, as far as reasonably practical, the security and safety of all fellows, students, staff, visitors, guests, contractors and property; while within or situated on College premises. To this end CCTV cameras are deployed at various locations within and around the College estate, to assist in the prevention and detection of crime, and the safety of those on college premises.

Document Purpose.

This document details the operating standards and procedures for closed circuit television (CCTV) systems installed at Pembroke College, Oxford, in accordance with the requirements of:

- The Data Protection Act 1998 (DPA).
- The General Data Protection Regulations 2018 (GDPR).
- The CCTV Code of Practice 21/04/2015 version 1.1 issued by the Information Commissioners Office.

Operating Principles.

To ensure compliance with the above, all CCTV operations, must at all times, adhere to the following principles.

- Fairly and lawfully processed.
- Processed for limited purpose and NOT in any manner incompatible with the purpose of the system.
- Adequate, relevant and not excessive.
- Accurate.
- Images are not retained for longer than is justifiably necessary.
- Processed in accordance with the individuals rights.
- Secure.

The operational requirement and justification for each camera in use across the premises, is documented in the “The CCTV Operational Requirement Report” at Appendix ‘A’. This report also details the extent and composition of the system.
Operational Management

The operational management of the CCTV is the responsibility of the Head Porter or their Deputy.

Data and Privacy Protection.

Responsible Persons.

The College Data Protection Officer is The Bursar, Jeremy Bennett

Data Protection Officer for CCTV is the Home Bursar, Mike Naworynsky

- The Home Bursar is the final decision making authority as regards requests under the terms of the Freedom of Information Act and requests from Data Subjects (persons whose images have been recorded by the system).

Data Controllers:

(a) Head Porter Steve Capper

(b) Deputy Head Porter Roger Charles

(c) IT Manager Simon Thomson

- Responsibilities for safeguarding the data, preventing unauthorised access and compliance with the operating principles.

CCTV Control of Viewing and Access to Data.

All viewing and observing of the CCTV images will be carried out in the lodge. No unauthorised access to the CCTV screens will be permitted at any time. Access will be strictly limited to the duty porter(s), the Data Protection Officers or the Data Controllers. Images saving to other formats such as DVD discs will only be carried out using the computer on the Head Porters desk or in the IT office.

The library operates a single camera to prevent and investigate book theft. Library staff are only able to view images from this single camera and it is therefore out of the main CCTV system but must be managed in line with the policy outlined in this document.

CCTV viewing or observing in other places will only take place if authorised by a Data Controller. This includes remote viewing.

All staff working in the viewing area (lodge) will be made aware of the sensitivity of handling CCTV images and recordings. The Head Porter will ensure that all staff are fully briefed and trained in respect of the functions, operational and administrative, arising from the use of CCTV.

Contractors working on the system will sign an undertaking that they understand and will comply with Pembroke College, CCTV Policy Standards and Procedures.

Images are retained on a secure hard drive for up to 28 days; after this period they are automatically over written.
Subject to the appropriate Data Act written request images are normally copied to a disc, which is then given to the requesting organisation or individual. In order to carry out this process, images are initially copied to a secure drive within the college system. Should there be any further requests, or if there has been a technical issue, these images are retained for two months on a secure password protected server. After two months these images are deleted by the Head Porter.

**Access to/Disclosure of CCTV images**

Access or disclosure requests will only be authorised by a Data Protection Officer or a Data Controller.

Requests for access to, or disclosure of (i.e. provision of a copy), images recorded on the College CCTV systems from third parties, will only be granted if the requestor falls within the following categories.

1. Data subjects (persons whose images have been recorded by the CCTV systems).
2. Law enforcement agencies.
3. An authorised college member who has responsibility for student discipline - in the course of a student disciplinary investigation.
4. An authorised member of college staff in the investigation of a Health and Safety at Work Act incident.
5. An authorised member of staff in the investigation of crime.
6. Relevant legal representatives of data subjects.

**Access to images by a law enforcement agency**

Law enforcement agencies may view or request copies of CCTV images subject to providing an appropriate written Data Protection Act 1998 request and in accordance with the protocols contained within this document. In very urgent serious cases of crime or public safety, relevant law enforcement agencies may view CCTV images if requested in person and subject to authorisation by one of the Data Controllers.

**Access to images by a subject**

CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Act. They do not have the right of instant access.

Additionally persons may make a Freedom of Information Act request.

A person whose image has been recorded and retained and who wishes access to the data must apply in writing to a Data Protection Officer using a Subject Access Request form. Subject Access Request Forms are obtainable from the lodge (As at Appendix ‘B’).

All applications must be made by the Data subject themselves, or their legal representative.

In accordance with Government guidelines a £10 search fee will be charged and is to be received by The College Accounts Department before data is supplied.
Such requests will be processed promptly and in the case of a Freedom of Information request responded to within 20 days. In the case of a Data Protection Request a copy will be provided within 40 days.

The Data Protection Act gives the Data Protection Officer the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, or the images have been erased. If a data subject access request is refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

The Freedom of Information Act 2000 gives the Data Protection Officer exemptions under Section 40 and 38 of that act which would prevent disclosure of CCTV images. If a refusal is made under these exemptions, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

**Request to prevent processing**

Sec 10 Data Protection Act 1998

An individual has the right to request to cease, or not to begin processing, or processing for a specified time period or in a specified manner, where this is likely to cause substantial and unwarranted damage or distress to that or another individual.

Such requests must be made in writing to the Data Protection Officer, who will provide a written response within 21 days of receiving the request, stating his reasons as to regarding the data subject notice as to any extent unjustified and the extent (if any) to which he has complied or intends to comply with it.

**Rights in relation to Automated Decision Taking**

Sec 12 Data Protection Act 1998.

Pembroke College CCTV system is not used in any manner in relation to automated decision taking.

**System Description**

Any changes or additions to the system will be in compliance with the Data Protection Act and the Information Commissioners Office CCTV code of practice.

Pembroke College CCTV has a number of IP cameras on three sites with images being transmitted to a secure server for storage and for recall at a later date, with a live feed being streamed from the server to the Lodge monitors on the main site.

The system comprises: Fixed position cameras and a single pan and tilt camera; Monitors: Multiplexers; Digital recorders; Information signs.

Cameras are located at strategic points on the three sites, principally at the entrance and exit point of sites and buildings. No cameras are hidden from view and none cover any areas which would be considered private. The college system does not have covert cameras.

The system is NOT capable of recording audio.

A detailed location of each camera is documented in the “The CCTV Operational Requirement Report” at Appendix ‘A’.
There are signs prominently placed at strategic points and at entrance/exit points informing that a CCTV installation is in use.

System log on is by individual or authorised department, the server is separately password protected. CCTV images are retained for up to 28 days, after this period the system automatically overwrites the existing data on a rolling basis. Images burned off for enforcement and investigation are kept for three months on a secure server then deleted by the Head Porter, once that period has reached. This is to ensure a backup should there be an issue with images burned to a CD.

The three sites on which CCTV is used are:

<table>
<thead>
<tr>
<th>Pembroke College (main site)</th>
<th>Pembroke College (Rokos Quad)</th>
<th>Geoffrey Arthur Building</th>
</tr>
</thead>
<tbody>
<tr>
<td>Pembroke Square</td>
<td>St Ebbes</td>
<td>Longford Close</td>
</tr>
<tr>
<td>Oxford</td>
<td>Oxford</td>
<td>Whitehouse Road</td>
</tr>
<tr>
<td>OX1 1 DW</td>
<td></td>
<td>OX1 4NJ</td>
</tr>
</tbody>
</table>

System Registration

Pembroke College CCTV system is registered with the Information Commissioners Office-registration number 27220695.

Policy and Procedures Review

Review date: January 2016

This document and its appendixes are subject to copyright and owned by Pembroke College, Oxford.

Written by: Steve Capper

Document Owner.

Head Porter

Pembroke College

Oxford.