

CCTV Policy

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Ownership	Data Protection Officer
Policy contact	dp@gold.ac.uk
Approval	Council
Protective Marking	Public
Last review date	September 2023
Next review date	September 2025

1 Introduction

- 1.1 Goldsmiths, University of London, New Cross, SE14 6NW (the College) has in place a CCTV surveillance system (the CCTV system) across its estate and facilities. This policy details the purpose, usage and management of the CCTV system and outlines the procedures to be followed to ensure the College's compliance with relevant legislation and the current Information Commissioner's Office CCTV Code of Practice.
- 1.2 Operation of the College's CCTV system will adhere to the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), as well as any subsequent data protection legislation, and also to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998.
- 1.3 Although not a relevant authority, the College will also adhere to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012, in particular the 12 guiding principles it contains.
- 1.4 This policy is informed by guidance issued by the Information Commissioner's Office, including:
 - "In the picture: A data protection code of practice for surveillance cameras and personal information"; and
 - The Employment Practices Code.
- 1.5 This policy applies to all of the College's CCTV systems, including:
 - Internet Protocol (IP) based CCTV cameras;
 - Analogue based CCTV cameras;
 - Body Worn Video (BWV) cameras.
- 1.6 This policy does not apply to any:
 - webcam or audio-visual systems located in meeting rooms or lecture theatres;
 - dashboard cameras installed in vehicles owned or operated by the College;
 - recording equipment used as part of the College's core educational and research activities;
 - temporary security measures installed due to high profile events or persons visiting the College campus.

2 CCTV System Overview

- 2.1 The CCTV system is owned and managed by the College and its appointed agents. The College is the data controller for images produced by the CCTV system.
- 2.2 Details of the cameras the CCTV system consists of are available on the College's website at: <https://www.gold.ac.uk/cctv/>.
- 2.3 The College's Head of Security is responsible for the overall management and operation of the CCTV system, including camera and signage installation, recordings, reviews, monitoring, data protection and the ensuring of compliance with this policy.
- 2.4 All CCTV monitoring is conducted live and retrospectively, and the CCTV control room is staffed 24/7.
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3 Purpose of the CCTV System

- 3.1 The principal purposes of the CCTV System are:
- the prevention, detection, reduction and investigation of crime and other incidents;
 - to ensure the safety of students, staff and visitors;
 - to assist in investigations of conduct on campus that is in breach of the College's regulations;
 - the monitoring of traffic and parking related matters.
- 3.2 The CCTV system will monitor those areas under its surveillance to identify incidents that require a response, in proportion to each incident detected.
- 3.3 Cameras are sited to cover: roadways, car parks, buildings, entrances and communal areas of residential accommodation, licensed premises, and potentially vulnerable public-facing areas.
- 3.4 Cameras are not intended to focus on areas in which individuals would have an expectation of privacy, or on neighbouring properties. Appropriate mitigations will be implemented where necessary to minimise coverage of such spaces.
- 3.5 Cameras, with the exception of body worn video (BWV), will not record audio.
- 3.6 Operation of the CCTV system will be conducted in a professional, ethical and legal manner and footage created by it will not be used for anything other than the purposes set out in this policy.

- 3.7 Staff may be subject to disciplinary procedures should they be found to have used the CCTV system inappropriately or for purposes beyond those set out in this policy.
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4 Recording, Monitoring and Retention

- 4.1 The CCTV system is monitored by trained security staff within the Security Office, accessible only to those authorised by the Head of Security.
- 4.2 Staff monitoring the system are equipped appropriately to communicate with patrolling security staff as and when necessary.
- 4.3 All images recorded by the CCTV system are the property and copyright of the College. Images are stored securely and used only for the stated purposes of the system.
- 4.4 The monitoring of staff activities will be conducted in accordance with Part 3 of the Employment Practices Code.
- 4.5 Cameras installed as part of the CCTV system will be of a suitable quality to fulfil the stated purposes of the system, and shall be regularly checked for image quality, date, and time stamp accuracy.
- 4.6 Qualified College staff or third-party contractors will be engaged to carry out regular checks and system maintenance to ensure the CCTV system is functioning and fit for purpose.
- 4.7 Covert cameras may be deployed to enhance the detection and prevention of crime on the College's premises. The deployment of such cameras will be limited and based upon incident data.
- 4.8 Covert recording will only take place where informing the individual(s) concerned would prejudice the reason for making the recording and where there is reasonable grounds to suspect that illegal activity is taking place. All such monitoring will be fully documented and will only take place for set periods, to be determined and approved by a member of the Senior Management Team prior to camera installation.
- 4.9 Body worn cameras may be used by security staff during patrols or when in attendance at specific events, such as a protest demonstration.
- 4.10 Security staff wearing body worn cameras will follow the procedures outlined in the Body Worn Video Procedures.
- 4.11 All recordings made via CCTV or BWV devices will be retained for a period of up to 30 calendar days, except when they are required for an internal or external investigation, in which case they will be retained, and their retention documented and reviewed by the Head of Security, until such investigations have been concluded.

5 Disclosure of CCTV Information to third parties

- 5.1 In instances where the College has reported a crime to the police, it may provide specific CCTV evidence to them in support of that report.
- 5.2 Internal and external requests to view or obtain a copy of CCTV recordings for any reason should be directed to dp@gold.ac.uk for consideration by the Data Protection Officer.
- 5.3 Requesters will need to justify their request and provide sufficient details to allow for the relevant images to be located on the CCTV system.
- 5.4 A record of disclosures will be maintained by the Data Protection Officer, itemising the date, time, requestor, authoriser and reason(s).
- 5.5 In some circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law in relation to the prevention or detection of crime, or in other circumstances where an exemption applies under relevant legislation. Such disclosures will be made at the discretion of the Data Protection Officer.
- 5.6 Article 6 of the UK GDPR provides a lawful basis for data processing where necessary to protect the “vital interests” of a data subject or of another natural person. The College recognises in some circumstances, for example, where the emergency services urgently require data relating to an individual in order to locate and protect that individual from the actions of either themselves or of others, and in the absence of the Data Protection Officer or other senior staff, security staff on duty may rely upon Article 6 “vital interests” in disclosing the requested information.
- 5.7 The Head of Security may provide access to CCTV images, having consulted with the Data Protection Officer, to internal Investigating Officers when footage is sought as evidence in relation to student or staff disciplinary cases.

6 Complaints

- 6.1 Complaints concerning the College’s use of its CCTV system, or the disclosure of CCTV images, should be made to the Data Protection Officer via dp@gold.ac.uk.

7 Monitoring Compliance

- 7.1 All staff involved in the operation of the College's CCTV system will be made aware of this policy, and that their authorised use of the system is subject to their adherence to the purposes and procedures contained herein.
- 7.2 All staff with access to the CCTV system and who have responsibility for the processing of CCTV recordings will be required to undertake data protection training.

Appendix: Legislation Referenced within the Policy

[Data Protection Act 2018](#)

[UK General Data Protection Regulations](#)

[Freedom of Information Act 2000](#)

[Human Rights Act 1998](#)

[Protection of Freedoms Act – Code of Practise for Surveillance Camera Systems:](#)

[Employment Practices Code – Part 3 “Monitoring at Work”](#)