HUGHES HALL
UNIVERSITY OF CAMBRIDGE

CLOSED CIRCUIT TELEVISION (CCTV) POLICY AND PROCEDURES

1. Introduction

The use of CCTV across the College site is to ensure the safety and security of its members and visitors, as well as safeguarding property, by monitoring activities: within College buildings, on its site, in its car parks and in other public areas. CCTV cameras, in conjunction with other security precautions, are installed at strategic points to assist in prevention and detection of crime. The legal basis for this processing is that it is necessary for the purposes of the College's legitimate interests, where we have concluded that our interests do not impact inappropriately on the fundamental rights and freedoms of the College's members and visitors.

2. Purposes of the CCTV system

The CCTV system has been installed by the College for the following purposes:

- To assist in the prevention and detection of crime
- To aid the identification, apprehension and prosecution of offenders (including the potential use of images in criminal proceedings)
- To reduce the fear of crime and reassure members of the College and visitors
- To help ensure the safety of College members and visitors
- To monitor the security of premises

3. Responsibility for the CCTV system

The College Officer with overall responsibility for the CCTV system is the Bursar, as College Data Protection Officer. The system is managed on a day-to-day basis by the Head of Facilities, in conjunction with the Head and Deputy Head Porters, and the IT Manager.

4. The system

The system covers the main College site, including: Fenner's Building, Wollaston Lodge, Margaret Wileman Building, the Edwin Leong Library, Chancellor's Court, Centenary Building, Gresham Court, the undercroft parking bays and Fenner's Car Park.

The system is operated 24 hours a day throughout the year. All cameras are fixed position and although some may have an audio recording function this will always be disabled). The system does not support a facial recognition facility.

College members and visitors are made aware of the CCTV system by appropriate signage at the entrances to the College site and in locations around the site. In normal circumstances, College CCTV will not be used for intrusive or directed surveillance (unless specifically requested, following the authorisation process for direct surveillance requests detailed below). Areas such as toilets and sleeping accommodation will not be monitored.

Public bodies such as the police are governed by strict rules within the Regulation of Investigatory Procedures Act 2000 (RIPA) about how and when cameras can be directed to view a location where an individual's specific activity can be monitored. Whilst the College is not bound by RIPA it will adopt the principles:

• It will not be used speculatively. There must be a well founded reason to think that an individual(s) is committing a crime or a serious breach of College rules. In deciding what amounts to serious consideration will be taken of the risks to individual(s), College property and College reputation. Consideration will be given to minimising collateral intrusion to those quite properly going about their normal daily business and whose image is captured by a directed camera.

5. Directed Surveillance

Any request for directed surveillance must be made to the Head of Facilities. The request will then be assessed by two of the following group: President, Bursar and Senior Tutor, depending on the request. The Bursar must be one of the decision-makers for staff matters, the Senior Tutor for students and the President for Fellows. The two decision-makers must satisfy themselves that there is a well-founded reason to think that the use of directed surveillance is proportional to the incident and likely outcome. Authorised directed surveillance is the only circumstance where the audio settings on cameras will be switched on. A record of the rationale will be created for each use of directed surveillance. This record will be entered by the Head of Facilities on the CCTV Log.

Decisions relating to installing additional cameras onto the general system, e.g. to fill in a gap in coverage or to install cameras at a newly purchased property, will be made by the Head of Facilities and the Bursar, following consultation with the Head Porter and IT Manager. Additional input may come from other members of the College if they have suggested that a need for a camera has arisen. A record of the decision will be entered by the Head of Facilities on the CCTV Log.

6. Recordings, Storage and Access

Recording

Live images from all cameras can be viewed, using the CCTV system's software programme, by the Porters in the Porters' Lodge, the Maintenance Manager and the IT Manager. All personnel able to view images from the cameras are trained on the use of the system.

Recorded images are stored on two digital data recorders which are part of the College's IT system. Images are retained for twenty-eight days and then automatically deleted by being overwritten. At the end of their useful life, the storage discs will be erased and securely disposed of as confidential waste.

CCTV images may be personal data and therefore fall within the scope of the Data Protection Act (2018). All processing of personal data will be done in accordance with the Data Protection Act, UK General Data Protection Regulation (GDPR), the guiding principles set out in the Biometrics and Surveillance Camera Commissioners' Office 'Code of Practice' (2013) and (2021) and the College's Data Protection Policy, and data protection statements, viewable at Policies and documents - Hughes Hall (cam.ac.uk). The legal basis for this processing is that it is necessary for the purposes of the College's legitimate interests, where we have concluded that our interests do not impact inappropriately on the fundamental rights and freedoms of the College's members and visitors.

Storage

The exception to the twenty-eight day retention rule is footage stored (via exporting an event) pending an internal or official investigation, and this footage is deleted when the investigation is complete. Storage is only permissible during investigations and the only system users who can perform the export function and access and store the recorded images are the IT Manager, Head Porter and Maintenance Manager.

Requests

Requests to access recorded CCTV images should be addressed to the Head of Facilities. In the event they are unavailable, requests should be made to the Bursar. Requests must be authorised by the Bursar, in accordance with the prevailing legislation in use at the time of the request. It is expected that most requests to view or receive copies of images will come from the police. Internal College requests to review recorded data during incident investigations must also follow this authorisation process. An in-person viewing of CCTV footage will usually be arranged in advance and the Head or Deputy Head Porter will be in attendance. A record of the viewing must be entered by the Head of Facilities on the CCTV Log. Information logged should include: name of person viewing image, time and date of viewing, time and date of images reviewed, brief reason for viewing content (e.g. "incident in corridor") but should not contain names of individuals featured in the recording.

Requests for copies of images by the police or other outside will be treated in accordance with College data sharing agreements and where possible, the College will notify the individual of its intention to share the data in advance. Applications received from outside bodies (e.g. solicitors) to view or release images must follow the authorisation process above and will only be accepted when satisfactory documentary evidence is provided showing they are required for legal proceedings or in response to a court order. Images required for these purposes will be kept for no longer than 6 months after the completion of the prosecution.

Requests for access to the CCTV images may also come from data subjects, i.e. those featuring in the CCTV images. Any such requests should be made via a Subject Access Request form, available at: Policies and documents - Hughes Hall (cam.ac.uk). Where the College is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

7. Maintenance

The location of cameras and accuracy of the date and time recorded will be checked on a yearly basis by the Head or Deputy Head Porter in conjunction with the IT department. A maintenance log will be kept in CCTV Log. Damage and faults are to be reported to the Head or Deputy Head Porter in the first instance, who will refer the issue to the Maintenance Manager / IT Manager, as appropriate.

8. Complaints and contacts

Any individuals with concerns about the CCTV system are requested to contact the Bursar in the first instance, via email: compliance@hughes.cam.ac.uk.

Copies of the College's CCTV Policy are publicly available from Policies and documents - Hughes Hall (cam.ac.uk).