



# CCTV Code of Practice

## 1. Introduction

This Code of Practice sets out the procedures for the use and management of Magdalene College's closed circuit television (CCTV) systems and images. Responsibility for the Code of Practice lies with the Data Controller (the Assistant Bursar). Day to day management of the CCTV systems is the responsibility of the Head porter and Deputy Head Porter, and through them the College Porters.

The purpose of the CCTV system within the College is to provide a safe and secure environment for members of the College, its employees and visitors, and to protect the College's property.

## 2. Legislation

The use of CCTV systems is subject to the Data Protection Act 1998, the General Data Protection Regulation 2016/679, the Human Rights Act 1998, the Freedom of Information Act 2000 and the Regulation of Investigatory Powers Act 2000 (RIPA).

When clarification is required The Assistant Bursar should contact the College's Solicitors for advice and guidance. The College's Solicitors should be contacted in all cases when RIPA request is received.

## 3. Purpose

The purposes of maintaining a CCTV system in the College include:

- To assist in the prevention or detection of crime.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the College's property and premises.
- To assist in the prevention, investigation and detection of disciplinary matters involving employees and students in accordance with college disciplinary procedures.

The system will not be used:

- To provide live streaming images for public access.
- To provide images for any marketing purpose.
- To monitor time worked or absences.

We respect and support the individual's entitlement to go about their lawful business and this is a primary consideration in the operation of the system. Although there is inevitably some loss of privacy when CCTV cameras are installed, cameras will not be used to monitor the progress of individuals in the ordinary course of lawful business in the area under surveillance. Individuals will only be continuously monitored if there is reasonable grounds to suspect an offence has been, or may be, about to be committed.



Breaches of this section of the Code of Practice by staff will be regarded as gross misconduct and will lead to disciplinary action, which may result in dismissal.

#### **4. Positioning and use of cameras**

Most cameras are sited so that they are clearly visible and publicity is given to the system by clear signing. This ensures that both the maximum deterrent value is achieved and that the public and staff are clearly aware when they are in a monitored area.

The College will only undertake covert recording with the written authorisation of the Assistant Bursar where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice, and the information obtained will only be used for this purpose. Once the specific investigation has been completed, covert monitoring will cease.

The system does not utilize non-functioning or “dummy” cameras. The system does not record sound.

#### **5. Recording and retention of images**

The College's CCTV systems record digitally; all cameras are recorded 24 hour a day. All images remain the property and copyright of Magdalene College.

Routine recordings are retained for a maximum of 31 days on the hard disc and then over-written. Except for evidential purposes images will not be copied in whole or in part.

Compact Discs (CD-R) are used for copying footage for investigation and the provision of evidence only. A record is kept of all CD-Rs recorded (Annex A) and a signed certificate required for any issued to third parties (Annex B). The security of the CD-Rs and maintenance of records is the responsibility of the Head porter and these will be reviewed by the Assistant Bursar at the end of each academic year.

#### **6. Access to images, and disclosure to third parties**

Recording equipment is kept in secure accommodation: access to the equipment and images is restricted to the operators of the CCTV system and to those line managers who are authorized to view them in accordance with the purposes of the system. All staff required to operate CCTV equipment are to receive training in the use of the equipment and must conform to this Code of

Practice at all times and are required to sign a confidentiality statement (Annex C). Any other staff will only be allowed access to the equipment by the authorization of the Assistant Bursar, and will



also sign the confidentiality statement. Signed statements should be placed on the member of staff's personnel file.

The provision of evidence or viewings will normally be requested either by the police or a College department conducting an investigation into criminal activities or disciplinary issues. The release of evidence or permission to view images may only be authorized by the Assistant Bursar or in their absence, the Head porter, and only in accordance with the purposes described in this Code. Once authorised, arrangements will be made to enable the investigating officer to view the images and if necessary be issued with a copy of recorded material on CD-R.

All requests for disclosure and access to images by third parties are logged in the CCTV Viewing record (Annex D), which is maintained by the Head porter and will be reviewed by the Assistant Bursar at the end of each academic year.

Recorded material may need to be submitted as evidence in criminal proceedings or at internal disciplinary hearings and therefore must be of good quality, and accurate in content. All material provided as evidence will be treated in accordance with clearly defined procedures either under the Police and Criminal Evidence Act (PACE) or this Code of Practice to ensure continuity of evidence and to ensure a clear audit trail.

Recorded material will not be sold or used for commercial purposes or the provision of entertainment. Images provided to the Police or other enforcement or investigatory agencies shall at no time be used for anything other than the purposes for which they were originally released.

## **7. Individuals' access rights**

Under the data protection legislation, individuals have the right on request to receive a copy of the personal data that the College holds about them, including CCTV images if they are recognisable from the image. Individuals wishing to access any CCTV images of themselves must make a written request to the Assistant Bursar using the Request for Access to Personal CCTV Images form (Annex E). The College will respond promptly and normally within one calendar month of receiving the request.

The Assistant Bursar, or in their absence the Head porter, will first determine whether disclosure of images will reveal third party information as individuals have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy. If the College is unable to comply with a request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, the individual making the request will be advised accordingly.

## **8. Breaches of the code of practice**

Staff who are in breach of this Code of Practice will be dealt with according to the College's disciplinary procedures - a process which could ultimately result in their dismissal.



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The responsibility for guaranteeing the security of the system will rest with the Assistant Bursar. The Head Porter or their Deputy will, in the first instance, investigate all breaches or allegations of breaches of security and will report their findings to the Assistant Bursar.

Tampering with cameras, monitoring or recording equipment, images or recorded data by unauthorized staff will be regarded as gross misconduct and will lead to disciplinary action, which may result in dismissal or criminal prosecution.

## **9. Complaints**

Complaints about the operation of the CCTV system should be addressed to the Assistant Bursar.

*H Foord*

*Last updated: 18<sup>th</sup> July 2019*

*Approved by: Governing Body Date: 17 May 2018*



**ISSUE CERTIFICATE**  
**COPY OF ORIGINAL (MASTER) EVIDENCE VIDEO**

**CD-R/DVD-R Copy No:** \_\_\_\_\_ **Original File Reference No:** \_\_\_\_\_ **PIN/Crime No:** \_\_\_\_\_

Magdalene College retains the ownership and copyright of the images recorded on this CD-R/DVD-R. Unauthorised use such as release for entertainment purposes is not permitted. After issue to an external agency, Magdalene College will no longer be responsible for the security or integrity of the contents of this CD-R/DVD-R.

When additional copies of this CD-R/DVD-R are required, the external enforcement agency who signed for this CD-R/DVD-R will be responsible for their production and issue and for providing an audit trail for continuity of evidence.

The external agency officer who made the additional copies will be responsible for their retrieval and destruction once the investigation/case is closed.

In addition the officer who signed for this CD-R/DVD-R will be responsible for its return to the Magdalene College's CCTV Control once the images are no longer required.

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**CD-R number** \_\_\_\_\_ **Issued to:**

**Rank/Title:** \_\_\_\_\_ **No:** \_\_\_\_\_ **Name:** \_\_\_\_\_

**Organisation and Contact Address:** \_\_\_\_\_

\_\_\_\_\_ **Tel:** \_\_\_\_\_ **email:**

\_\_\_\_\_ **Date:** \_\_\_\_\_ **Time:** \_\_\_\_\_ **Signature:** \_\_\_\_\_

**CCTV SYSTEMS IN COLLEGE PREMISES**  
**CONFIDENTIALITY STATEMENT AND UNDERTAKING**

I understand that, as part of my contract of employment with the College, I will be required to operate Close Circuit Television monitoring and recording equipment (CCTV equipment) installed as part of the College building security arrangements.

I confirm that I have had explained to me and fully understand the importance of operating and using the CCTV equipment entirely in accordance with the Code of Practice and all other instructions governing this issued to me from time to time. In particular, I understand the need to maintain confidentiality about events and/or staff or public movements seen or recorded by the CCTV equipment, unless required or authorised to disclose these in accordance with the Code of Practice.

I therefore undertake not (except in the proper course of my duties with the College and as required or authorised by the Code of Practice), during or after my period of employment with the College, to divulge to any person whatsoever or otherwise make use of (and will use my best endeavours to prevent the improper publication, disclosure or use of) any information about events and/or staff or public movements seen or recorded by the CCTV equipment.

I understand that any breach of this undertaking, the Code of Practice or other instructions concerning the use or operation of the CCTV equipment may amount to gross misconduct and will result in disciplinary action which may lead to my dismissal. I also understand that, if such breaches involve the supply of information or material to a third party for gain or reward, the College will be entitled to the return of any payment (actual or in kind) received by me and will take legal action to enforce this

Signed..... Name.....

Date.....

**In the presence of (signature and name of witness)**

Signed..... Name.....

Date.....





Brief description of the applicant's appearance and likely activities captured by CCTV:

Please give any other information that might assist us in finding the information required:

Do you require a hard copy of the image or would viewing the images be sufficient?

Hard copy

Viewing

**DECLARATION**

Tick as applicable.

- I confirm that all of the information I have provided is correct and that I am the Data Subject.
- I confirm that I am acting on behalf of the Data Subject and have attached proof of my authority to do so.

Name:

Postal address:

Postcode:

Email address:

Signed:

Date:

**PROOF OF IDENTITY**

If you are applying on someone else's behalf, please attach documented authority to act on the data subject's behalf.

**When you have completed and checked this form, please take or send it to:  
Helen Foord, Assistant Bursar, Magdalene College, Magdalene Street, Cambridge, CB3 0AG.  
hf265@cam.ac.uk**

If you have any queries regarding this form or your application please contact us on 01223 332140

