

CCTV Policy

Version 1.1

Contents

1.0 Document Control	2
2.0 Introduction	2
3.0 CCTV System overview and definitions	2
4.0 CCTV Owners	3
5.0 The EU General Data Protection Regulations (GDPR) 2018	3
6.0 Access to images	3
7.0 Applications to review images	3
8.0 Section 29 Requests (Data Protection Act 1998).....	4
9.0 Data Subjects Access Requests	4
10.0 Complaints Procedure	5
11.0 Retention and disposal	5
Appendix A – Request to review CCTV footage Form	7
Appendix B – Section 29 Information Disclosure Request Form	9
Appendix C - CCTV Data Subject Access Request Form	12
Appendix D – Formal Complaints Form	14
Appendix E – Guidance Document CCTV Operational Processes	16
1.0 Introduction	16
2.0 Installation of cameras	16
3.0 CCTV equipment	16
4. Recording equipment and material	16
5. Access To and Review and Viewing of CCTV Recorded Material.....	17
6. Training	17

1.0 Document Control

Version Number	Author	Purpose/Change	Date
1.0	Ness Donaldson	First version of draft	30.01.2018
1.1	Ness Donaldson	First published version	17.05.2018

2.0 Introduction

This policy explains the purpose, use, and management of the CCTV installation at the Institute of Development Studies.

2.1 The purposes of the CCTV installation is:

- the protection of staff, students, visitors, and the assets of the Institute
- the prevention, investigation and detection of crime and disciplinary offences in accordance with the Institute disciplinary procedures
- the apprehension and prosecution of offenders (including the use of images/data as evidence in criminal / civil proceedings)
- the monitoring of the security of premises

2.2 The principles of the policy are:

- that individuals' rights are respected and protected
- that the installations are operated fairly and within the law
- that the CCTV system is operated for the purposes for which it was set up
- that the recorded material/data stored is fairly and lawfully processed
- that recorded material/data is adequate, relevant and not excessive for the purposes
- that recorded material/data is accurate, securely stored, and not kept for longer than is necessary

2.3 This policy and its operations will be subject to regular reviews and audits, no less than every two years.

2.4 This policy is supported by the CCTV Operational procedures (see appendix E).

3.0 CCTV System overview and definitions

3.1 The CCTV system includes 16 cameras inside and outside of the IDS building.

3.2 The system will be operated 24 hours per day, 365 days of the year.

3.3 The CCTV installation comprises of fixed cameras, signs, recording and playing equipment and data.

3.4 Recorded material/data means any material recorded by the installation. The recorded material/data are the property of the Institute of Development Studies.

3.5 The system will be maintained on behalf of the Institute by AM Fire & Security Group to ensure compliance with the EU General Data Protection Regulations 2018.

4.0 CCTV Owners

4.1 The CCTV surveillance system is owned by the Institute of Development Studies.

4.2 The Head of Facilities is the responsible person for the management and operation of the system, with nominated individuals given authority to operate the system in strict compliance with this policy.

4.3 The Institute's Data Protection Officer has ensured this policy complies with EU General Data Protection Regulations 2018. For any Data Protection queries please email: dpo@ids.ac.uk

5.0 The EU General Data Protection Regulations (GDPR) 2018

5.1 The Institute's CCTV installations are registered with the Information Commissioner's Office and all release of information will be in accordance with that registration.

5.2 A data protection exemption relates to the disclosure of information for the purposes of:

- the prevention, investigation, detection or prosecution of criminal offences
- the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security

This exemption applies only where non-disclosure would be likely to prejudice one of these purposes. See section 8 for further information.

5.3 For the purpose of the EU General Data Protection Regulations 2018 the Institute of Development Studies is the data controller.

6.0 Access to images

6.1 The ability to review recorded and live images is limited to authorised staff personnel only, namely:

- The Head of Facilities
- The Senior Facilities Officer
- The Catering Officer
- The Evening Supervisor
- The Data Protection Officer
- Our CCTV maintenance engineers; AM Fire & Security Group
- University of Sussex Security Officers

7.0 Applications to review images

7.1 Uniformed police or UOS security officers may apply to review CCTV footage.

7.2 The request must be made in writing using the Application Form within Appendix A and detail:

- The date, time and location
- The reason for the request (which must comply with the purposes as laid out in 2.1 of this policy)

7.3 All requests should be made within 10 working days of the recording to ensure footage is not erased.

8.0 Chapter 3 Requests (GDPR 2018)

8.1 Under chapter 3, Article 23, GDPR 2018 the Data Controller may grant relevant authorities (the police or other law enforcement agencies) access to personal CCTV data without the consent of the data subject for the purposes of:

- the prevention, investigation, detection or prosecution of criminal offences
- the execution of criminal penalties, including the safeguarding against and the prevention of threats to public security

8.2 This is not an automatic right of access to information. The data controller can assess the merits of requests and decide whether or not to apply chapter 3 requests.

8.3 The Information Commissioners Office produces guidance for organisations who may be asked to release information. This guidance includes factors we must take into consideration when deciding whether to release information to relevant authorities.

8.4 Requests for access to information under Chapter 3 must be made using Appendix B.

8.5 Please note that this form **must** be signed off by someone of inspector rank or above. If the form has not been fully and properly completed and authorised you will be asked to re-submit your application. We are prepared to accept an email from the authorising inspector, attaching the Chapter 3 request and stating clearly that they are authorising the form if there are circumstances where a handwritten signature on the form cannot be obtained.

8.6 Your request will be assessed to ensure that your request falls within the scope of Chapter 3 of the regulations and is proportionate to the reason the information is being requested.

8.7 There is no statutory time limit within which local authorities are expected to respond to requests made under Chapter 3. We will endeavor to provide information as soon as possible.

9.0 Data Subjects Access Requests

9.1. GDPR gives individuals the right to access personal information about themselves, which includes CCTV images.

9.2. All requests for access to CCTV images should be made in writing to the Institute's Data Protection Officer.

9.3 All requests will be treated as a Subject Access Request under the GDPR. Any requests need to include the date, time, and location where the CCTV image was recorded and may require further information to identify the individual. The Institute will respond promptly and at the latest within 40 days of receiving the request and sufficient information to identify the CCTV images. See appendix C.

9.4. If the Institute cannot comply with a request under the GDPR the reasons must be documented as to why not. The data subject must be advised in writing, giving the reason why the information cannot be released, where possible.

9.5. The manager responsible for the CCTV system will determine whether disclosure of the CCTV images would disclose third party information.

9.6. Where CCTV images reveal other individuals, the Institute must blur or disfigure the faces of those other individuals so that they are not recognisable.

9.7. In addition to the right of access, an individual also has the right to ask the Institute to stop processing personal data where this is likely to cause substantial and unwarranted damage to him or her. Any such requests should be submitted in writing to the Institute's Data Protection Officer. Upon receipt of such a request the Institute has 21 days in which to respond with its decision. All decisions should be documented and a record should be kept of all requests and the Institute's response to those requests.

9.8. If there is any doubt about what information must be provided to enquirers, please contact the Institute's Data Protection Officer.

10.0 Complaints Procedure

10.1 Any complaints regarding the CCTV system and its application should be made using the complaints form (Appendix D).

10.2 For general enquiries in relation to CCTV and this policy please email: dpo@ids.ac.uk

11.0 Retention and disposal

11.1 Unless required for evidential purposes or the investigation of a crime or otherwise required by law, recorded images will be retained for no longer than 30 days from the date of recording.

11.2 At the end of their useful life all images will be erased.

Appendix A – Request to review CCTV footage Form

This form should be used for requests to view CCTV images by uniformed police or UOS security officers in response to incident which occurred on the same day e.g. to assist in a specific criminal enquiry, identify a victim, witness or perpetrator in relation to a criminal incident.

This form should not be used where the police or other law enforcement agencies request a copy of CCTV images. A Chapter 3 request should be made for this type of access. Please refer to the Data Protection Officer – email: dpo@ids.ac.uk

This form should not be used by an individual who requests a copy of CCTV images relating to themselves. A subject access request under the EU General Data Protection Regulations 2018 is required for this type of access. Please also refer to the Data Protection Officer – email: dpo@ids.ac.uk

Part A - To be completed by the requestor

Name:	
Staff identification number:	
Email address:	
Date of CCTV footage to be viewed:	
Time of CCTV footage to be viewed:	
Location of CCTV footage to be viewed:	
Reason for request:	

Completed forms should be returned to:

Data Protection Officer
Institute of Development Studies
Institute of Sussex
Library Road
Falmer
BN19RE
Email: dpo@ids.ac.uk

The Institute of Development Studies is committed to the principles defined in the EU General Data Protection Regulations 2018. As such, information collected in this document will be used only for the purposes described above. We may, however, store the data in manual or electronic form, but only for as long as we are required to do so by law. By submitting this form you consent to these conditions.

Part B - To be completed by an authorised member of staff. This document forms part of the CCTV footage viewing log.

CCTV reviewed on:	
CCTV reviewed by (name and position):	
Camera number viewed:	
Time period of footage viewed:	
Action taken/findings:	
Name:	
Signature:	

Appendix B – Chapter 3 Information Disclosure Request Form

Requestor

Full name	
Job title:	
Organisation:	
Address (include postcode)	
Daytime number*:	
Email address*:	

* You must provide one method of contact

Data subject

Full name	
Date of Birth	
Address (include postcode)	
Other identifying information	

Specific information required

Reason for requesting disclosure

Offence(s)

Unable to specify offence due to risk of prejudicing the case

Statutory powers (Do not cite chapter 3 the EU General Data Protection Regulations)

Purpose

State the purpose for requesting disclosure of personal information about the data subject specified in section 2 of this form. Select one option:

- The prevention, investigation, detection or prosecution of criminal offences
- The execution of criminal penalties, including the safeguarding against and the prevention of threats to public security

Information provision

If we hold information how would you like the information to be provided?

- Electronically using Secure File Transfer
- Collect in person (Proof of identification required when collecting)

We will notify you if we do not hold information or your request for disclosure is refused.

Declaration and authorisation

The authorising officer must be of the rank of police inspector or higher, or for other 'relevant bodies' a senior officer/manger.

Declaration

I certify that:

- Information requested is compatible with the stated purpose (section 4) and will not be used in anyway incompatible with that purpose
- Non-disclosure would prejudice the case
- I understand information given on this form is correct

Requestor

Signed:		Date:	
---------	--	-------	--

Authorising Officer

First name:		Last name:	
Job title:			
Signed:		Date:	

Completed forms should be returned to:

Data Protection Officer
 Institute of Development Studies
 Institute of Sussex
 Library Road
 Falmer
 BN19RE
 Email: dpo@ids.ac.uk

The Institute of Development Studies is committed to the principles defined in the EU General Data Protection Regulations 2018. As such, information collected in this document will be used only for the purposes described above. We may, however, store the data in manual or electronic form, but only for as long as we are required to do so by law. By submitting this form you consent to these conditions.

Appendix C - CCTV Data Subject Access Request Form

Under the terms of the EU General Data Protection Regulations 2018, an individual is entitled to ask for a copy of all personal information which is held about him/her for the purposes of providing services to the individual. Please complete this form, providing as much information as possible, should you wish to exercise your right in requesting disclosure of your data.

PLEASE NOTE THAT RECORDED DATA IS ONLY HELD FOR 30 DAYS BEFORE IT IS DELETED

Requestor

Full name	
Address (include postcode)	
Daytime number*:	
Email address*:	
Gender:	

Information Required

To help us find the CCTV data you require, please complete the following section: please be as accurate as possible with times, location and identification.

Date	
Time:	
Location:	
Description of incident	

Declaration

I confirm that this is all of the personal data to which I am requesting access. I also confirm that I am the Data Subject and not someone acting on his/her behalf.

Signed	
Date	

Proof of identity

Please enclose copies of at least two proofs of identity such as a driving licence, passport recent utility bill etc. Failure to provide these documents with your application will mean that your request is refused

Completed forms should be returned to:

Data Protection Officer
Institute of Development Studies
Institute of Sussex
Library Road
Falmer
BN19RE
Email: dpo@ids.ac.uk

The Institute of Development Studies is committed to the principles defined in the EU General Data Protection Regulations 2018. As such, information collected in, or accompanying this document will be used only for the purposes described above. We may, however, store the data in manual or electronic form, but only for as long as we are required to do so by law. By submitting this form you consent to these conditions.

Appendix D – Formal Complaints Form

This form should be used to complain about the Institute’s CCTV system/service received.

Your details

Full name	
Address for correspondence* (include postcode)	
Daytime number*:	
Email address*:	

* You must provide one method of contact

Your complaint

Please summarise the details of your complaint:	
---	--

Who did you approach to resolve your complaint informally and what action was taken?	
--	--

How do you propose that your complaint could be resolved to your satisfaction?	
--	--

Signed:	
Print name:	
Dated:	

Completed forms should be returned to:

Data Protection Officer
 Institute of Development Studies
 Institute of Sussex
 Library Road
 Falmer
 BN19RE
 Email: dpo@ids.ac.uk

The Institute of Development Studies is committed to the principles defined in the EU General Data Protection Regulations 2018. As such, information collected in this document will be used only for the purposes described above. We may, however, store the data in manual or electronic form, but only for as long as we are required to do so by law. By submitting this form you consent to these conditions

Appendix E – Guidance Document CCTV Operational Processes

1.0 Introduction

1.1 These procedures sit alongside the Institute's CCTV Policy.

1.2 These processes explain the operational management of the Institute's CCTV system.

1.3 These processes will be subject to regular reviews and audits, no less than every two years and will be reviewed in conjunction with the CCTV policy.

2.0 Installation of cameras

2.1 The location of CCTV cameras will be determined by the Facilities department.

2.2 Each area of the Institute building monitored by CCTV systems will be identified by a sign/notice in the approved format.

3.0 CCTV equipment

3.1 The CCTV equipment installations shall be fit for the purposes detailed in section 2 of the CCTV policy.

3.2 The equipment will perform properly and provide clear images/data.

3.3 The equipment which records material/data will feature accurate date and time references. A minimum of a weekly check on date/time references to be undertaken by appropriate personnel.

3.4 The CCTV recorded images will be recorded continuously.

3.6 The CCTV installations will be maintained in compliance with manufacturers' recommendations by a specialist company under contract to the Institute.

3.7 These maintenance checks will in particular provide an assessment that the equipment is functioning at its optimum performance and that its location time/data referencing information (where this facility is provided) is accurate.

4. Recording equipment and material

4.1 Recording equipment will be located in a secure server room where access to the room is limited to:

- Authorised IT & Facilities staff
- The CCTV System engineers - AM Fire & Security Group
- Specialist IT contractors, as required

4.2 Digital Video Recorders (DVRs) record continuously and are overwritten after a minimum of 30 days. Any CCTV footage request (see below) must be isolated and separately stored electronically for the purpose of any investigation.

5. Access To and Review and Viewing of CCTV Recorded Material

5.1 The viewing and initial reviewing of CCTV recorded material is restricted to only authorised Institute employees, security personnel (See CCTV policy section 6.1) and will only be for the purposes outlined in the CCTV policy.

5.2 Authorised staff may transfer copies of requested images externally to an agency involved in the investigation or prevention of a crime or taxation matter (Chapter 3 requests) or to a legal representative in a criminal or civil proceedings. For example to the police or similar agencies or to solicitors involved in a legal proceeding. External requests of this nature should be reported and agreed with the Data Protection Officer at dpo@ids.ac.uk.

5.2 All CCTV viewings, reviews, image copying and transfers should be logged and recorded in local CCTV management logs.

5.3 Any requests by any individual to have access to or copies of images of themselves captured in CCTV images should be managed as a potential GDPR Subject Access Request. Such requests should be considered and managed by the Data Protection Officer in consultation with the Head of Facilities by contacting dpo@ids.ac.uk.

5.4 When considering transferring CCTV images to support a Section 29 Information Disclosure Request or a Subject Access Request, it may be necessary to 'mask out' identifiable individuals captured in images who are not related to the investigation or request, and who have a right to continued privacy. Specialist technical intervention should be undertaken under the direction of authorised Institute employees or their security contractors to ensure that no unintentional disclosure of personal information of this kind occurs in the transfer of any CCTV copy images to an internal investigation, external requestor or individual as part of a GDPR Subject Access Request.

6. Training

7.1 The Institute will provide appropriate training for all staff to cover awareness of data protection and information security matters, the CCTV policy and operational procedures.