CCTV POLICY

INTRODUCTION

St Peter’s College has in place a closed circuit television system to provide a safe and secure environment for students, staff and visitors, and to protect College property.

This document sets out the accepted use and management of the CCTV system and images to ensure the College complies with the General Data Protection Regulation (GDPR) and associated legislation (‘data privacy legislation’), the Human Rights Act 1998 (HRA), the Surveillance Camera Code of Practice issued under the Protection of Freedoms Act (POFA Code) and other legislation.

PURPOSE OF CCTV

The College has installed a CCTV system to deter crime, assist in prevention and detection of crime, and assist with the identification, apprehension, and prosecution of offenders and to maintain the security of College premises, property, and equipment.

The system will be provided and operated in a way that is consistent with an individual’s right to privacy.

It is not the College’s intended purpose to use CCTV for monitoring the work of employees or finding out whether or not they are complying with the organisation’s policies and procedures.

PRINCIPLES

The following principles apply:

- CCTV will be installed only when and where it is a necessary and proportionate way of dealing with a problem;

- The College will ensure that all cameras are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified;

- Signs will be displayed prominently to inform employees, members of the College and other individuals that CCTV is in use;

- No images and information will be stored beyond those, which are strictly required for the stated purpose of a surveillance camera system;
• Access to retained images and information will be restricted, with clearly defined rules on who can gain access;

• Surveillance images and information will be subject to appropriate security measures to safeguard against unauthorised access and use.

**MONITORING AND REVIEW**

A formal review of this policy will take place every 3 years or sooner if there is a policy need or legislative change.

This policy does not form part of employees' terms and conditions of employment and may be subject to change at the discretion of the Governing Body.

**CCTV GUIDELINES**

**CCTV FOOTAGE**

Live CCTV footage can be viewed by:

- Lodge staff;
- Lodge Supervisor

Recorded CCTV footage can be reviewed (not deleted or amended) by:

- Lodge Supervisor and the Lodge staff;
- Accommodation, Conferences and Events Manager;
- IT Office;
- Other College officials by way of permission of the Accommodation, Conferences and Events Manager; IT Office; or the Lodge Supervisor;
- The Police or the University Security Services under supervision of the Accommodation, Conferences and Events Manager; IT Office; or the Lodge Supervisor.

Camera surveillance will be maintained at all times and footage continuously recorded and held on system memory for a period of up to 28 days.

Employees, members of the College and visitors whose images are recorded have a right to view those images of themselves and to be provided with a copy of the images within 40 days of their request, as long as they have not been automatically deleted. Employees making such a request should write to the Data Protection Officer of the College providing the relevant time and date of the image, so that they may be easily identifiable. The DPO will log such requests in the Subject Access Request Log. The DPO can be contacted on dataprotection@spc.ox.ac.uk.
ST PETER’S COLLEGE STAFF AND STUDENTS

As stated, the primary purpose of CCTV is to protect the property and people of St Peter’s College. However, when CCTV is installed in a college, it is likely to capture pictures of staff and students, even if they are not the main subject of surveillance.

CCTV evidence may be used as part of an investigation where, in the reasonable belief of the College, there may have been serious or gross misconduct committed. In such cases, the Human Resources Manager or the College Registrar must request the footage.

In the case of a non-College employee or student, any evidence identified may be passed to the relevant authority.

In accordance with the CCTV Code of Practice, where footage is used in disciplinary proceedings, the footage will be retained and the employee or student allowed to see and respond to the images.

COMPLAINTS

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

BREACHES OF THIS POLICY

The Bursar, in order for the appropriate action to be taken, initially investigates any breach of this policy.