

TITLE:

**CCTV (Closed Circuit Television System) SOP**

**Summary of Contents:**

In compliance with the Data Protection Act (2018), the ICO CCTV Code of Practice and the College's Data Protection Policy, this Standard Operating Procedure (SOP) provides staff, students and visitors with information, guidance and procedures in relation to the College use of CCTV and its disclosure within controlled conditions.

**Date Created:**  
October 2013

**Latest CMT Approval Date:**  
9 January 2023

**Responsible Owner:**

Head of Estates and Facilities Management

REVIEW INFORMATION

Created: October 2013  
Reviewed: November 2014  
May 2016  
May 2019  
May 2020  
July 2021  
December 2021  
December 2022

Next Review Due: December 2023

Requires CMT Approval (yes/no):

*Nov 2014: No*  
*May 2016: Yes*  
*May 2019: Yes*

Previous Reference (for control purposes):

*N/A*

## **1.0 PURPOSE**

- 1.1 SERC Estates operates Closed Circuit Television systems (CCTV) on a number of campuses i.e. Bangor, Newtownards, SPACE, Holywood, Lisburn (main campus), Downpatrick, Ballynahinch and Newcastle (excluding standalone Creche system), to provide staff, students and visitors with a safe environment and also to protect College property against criminal damage.
- 1.2 The use of CCTV is regulated by the General Data Protection Regulations (UK GDPR) / Data Protection Act (2018) as its usual purpose is to record the activity of individuals and/or information relating to them e.g. car registration plate.
- 1.3 SERC is registered with the Information Commissioners Office to process personal data, Notification Number Z6477199.
- 1.4 The purpose of this Standard Operating Procedure (SOP) is to outline the Colleges approach to using CCTV and how we will comply with UK GDPR / Data Protection Act (2018) and the CCTV Code of Practice. This procedure is not applicable to targeted surveillance activity.
- 1.5 All staff, students and visitors should have a reasonable expectation of being captured on CCTV on a daily basis.
- 1.6 While the use of CCTV is primarily for the following purposes, the College will regulate its use so as not to become intrusive:
  - Deterring, prevention and detection of a crime including misuse / abuse of SERC equipment.
  - Identification, apprehension and prosecution of offenders.
  - Security of campus buildings and ground.
  - Safeguarding/Health and Safety
  - Legal proceeding
  - Insurance purpose
- 1.7 In exceptional circumstances the images may be viewed to clarify student / staff misconduct for investigatory purposes. This will only be carried out with the explicit permission from Human Resources, Campus Manager, member of CMT.

## **2.0 SCOPE**

- 2.1 This Procedure applies to all SERC staff, students, contractors, visitors and members of the public who may be captured on CCTV.
- 2.2 Guidance specific to the Little SERC (Creche) section of the Newcastle Campus is available in Appendix 1 of this SOP

## **3.0 OWNERSHIP OF IMAGES**

- 3.1 As the Data Controller, SERC owns all images captured on its CCTV surveillance system.
- 3.2 Access to footage on these sites is controlled by the Estates Department. The Campus Manager will be the primary contact for CCTV in the Bangor, Newtownards, SPACE and Holywood campuses.

- 3.3 The Campus Manager or person designated by them, will process images in line with the SERC 'CCTV SOP' and will not permit anyone to view these images unless the individuals' role is clearly identified in Section 6.10 of this SOP.
- 3.4 All CCTV systems in the Bangor, Newtownards, SPACE and Holywood campuses are maintained by the Estates Department who will retain access to footage for limited purposes and emergency.
- 3.5 Graham Asset Management (GAM) are CCTV Data Processors for the PPP premises i.e. Lisburn (main campus), Downpatrick, Ballynahinch and Newcastle (excluding Creche). GAM process images in line with the SERC 'CCTV SOP' and do not permit anyone to view these images unless the individuals' role is clearly identified in Section 6.10 of this SOP.
- 3.5 **SERC is ultimately responsible for all recorded images, how it will be used and to whom it can be disclosed.**

## **4.0 OVERVIEW**

- 4.1 The CCTV system operates 24 hours a day, 7 days a week.
- 4.2 Equipment used, image quality, camera siting and locations are appropriate to ensure that the images are adequate for the purpose for which they are being collected.
- 4.3 To raise awareness of the use of CCTV on College premises, signs are placed at all entrances to inform staff, students, contractors and visitors that they are entering a zone where CCTV is in operation. All signs stipulate the purpose of the CCTV surveillance, and a contact number should any person want further information regarding the system.
- 4.4 If there is cause for CCTV to be installed in an area where there would be a heightened expectation of privacy e.g. rest rooms, signs will be prominently placed to clearly inform individuals of the presence of CCTV surveillance. Such occasions will only be necessary if there is suspicion of activity which will be reported to the Police.
- 4.5 Conversations will not be recorded on any camera. Cameras are solely to monitor and record the movements and actions of individuals.
- 4.6 The positioning of the CCTV system is planned to ensure maximum effectiveness and efficiency however the College cannot guarantee that all incidents will be detected.
- 4.7 CCTV systems on the Bangor, Newtownards, SPACE and Holywood Campuses are serviced on an annual basis. CCTV systems on the Lisburn (main campus), Downpatrick, Ballynahinch and Newcastle (excluding Creche) campuses are serviced biannually.

## **5.0 ACCESS TO IMAGES AND SECURITY**

- 5.1 Access to CCTV images is restricted to those staff authorised to do so in accordance with the purposes of the system.
- 5.2 Bangor, Newtownards, SPACE and Holywood Campuses  
Staff authorised to access the CCTV system and search for extracts of footage is restricted to the Campus Manager or person designated by them.
- 5.3 PPP Campuses  
Staff authorised to access the CCTV system and search for extracts of footage is restricted to GAM managers and their designated appointees.

5.4 All monitors which display images captured on CCTV are password protected and only accessible by the Campus Manager designated appointees (Bangor, Newtownards, SPACE and Holywood campuses) and the GAM managers/designated appointees (Lisburn (main campus), Downpatrick, Ballynahinch and Newcastle campuses).

## **6.0 VIEWING AND DISCLOSURE OF CCTV FOOTAGE**

6.1 Disclosure of images from the CCTV system is controlled and is consistent with the purpose for which the system was established. See Section 1.6

6.2 Permission to view CCTV footage will not be granted to anyone whose role is not explicitly identified in this procedure. See section 6.10.

6.3 Urgent requests will be processed as soon as possible i.e. where there is immediate risk to health and safety or where a crime has been suspected.

6.4 Non-urgent requests will be processed within 5 working days.

6.5 All requests in relation to the Bangor, Newtownards, SPACE and Holywood campuses must be made to those identified in Section 5.2 of this SOP.

6.6 Requests in relation to the Lisburn (main campus), Downpatrick, Ballynahinch and Newcastle (excluding creche) campuses must be made to GAM Managers or their appointees.

6.7 Requests should include:

1. Date and time the images were recorded
2. Information to identify the individual, if necessary
3. Location of the camera, if known.

6.8 All occasions of CCTV footage being viewed/released must be documented (see appendix 1) and retained for record purposes.

6.9 CCTV recordings will be viewed in a closed area by the appointed personnel only unless they explicitly give permission for another individual to be there, however their presence must be in relation to the content of the images e.g. to identify an individual.

6.10 Individuals permitted to request and view CCTV material on any campus are:

### SERC Personnel

- College Management Team
- Campus Manager
- HR Services Manager
- HR Business Partners
- Investigating Officers
- Head of Estates / Deputy Head of Estates / Senior Projects Manager
- Head of Unit
- Head of School
- Head of Health and Safety
- Records Manager
- Programme Managers (TFS)

### 6.11 Releasing CCTV Footage

The College may receive requests for 'copies' of images captured on the CCTV system from individuals/external organisations.

The Campus Managers with guidance from the Records Manager, will consider these requests for all campuses in line with the purpose of the CCTV system and the Data Protection Act (2018). In relation to requests from GAM, the Campus Manager will liaise with the relevant manager to obtain the footage and review.

Where footage is being released, it must be encrypted prior to release regardless of format i.e. disc or email.

Again, Appendix 1 must be completed and retained by the Campus Manager or persons designated by them.

### 6.12 Law Enforcement

Should the College receive a request from any law enforcement agency, the Campus Manager, or person designated by them, and with guidance from the Records Manager / Graham FM / nominee will review and release the CCTV images where the content may assist with detection/prevention of a crime/terrorism as deemed appropriate.

Such agencies must provide proof of legitimacy for their request e.g. PSNI should provide a Form 81 with proof of permission to seek the footage.

### 6.13 Data Subject requests

The UK GDPR gives individuals the right to access to personal data held in relation to them by the College, this includes CCTV images. All Subject Access Requests must be made in compliance with the College Data Protection Policy. The Campus Manager / Graham FM will arrange to view the images to assess if the release of the footage would evoke an exemption within the Data Protection Act (2018).

### 6.14 Third Party requests

Requests for CCTV images from third parties e.g. solicitors must be referred to the Campus Manager and after guidance from the Records Manager / Graham FM will arrange to view the images to assess if the release of the footage would evoke an exemption within the Data Protection Act (2018).

### 6.15 Safeguarding

Requests in relation to a safeguarding incident supersede this SOP. Requests may be made by any member of staff in an emergency on any campus.

Staff should contact those staff named in Sections 5.2 and 5.3 of this SOP and efforts immediately made to assist the enquiry.

Staff who have access to the CCTV systems must comply with requests immediately.

## **7.0 RETENTION AND DISPOSAL**

All College CCTV images will be retained for a maximum of 30 days unless the College is made known of images which may assist with an investigation of an incident/crime. In such cases, the College will extract the relevant footage and retain until the investigation and any subsequent appeals are complete after which it will be securely disposed of.

## **8.0 COMMUNICATION PLAN**

This procedure will be placed on the Learning Engine on the Staff Intranet, as well as being published on the College website and Student Intranet. Staff will be made aware of their responsibilities during induction. Signage will also be displayed on all campuses to inform students, staff and the public of the presence of CCTV surveillance.

## **9.0 REVIEW**

This procedure will be reviewed (and if necessary updated) biannually or sooner if required to reflect changes in legislation or circumstance.

## **Background**

This Appendix applies specifically to 'Little SERC' (the creche) at the SERC Newcastle Campus.

The use of CCTV is regulated by the General Data Protection Regulations (UK GDPR) / Data Protection Act (2018) as its usual purpose is to record the activity of individuals and/or information relating to them e.g. car registration plate.

'Little SERC' falls within the scope of SERC's registration with the Information Commissioners Office to process personal data, Notification Number Z6477199.

The purpose of this Standard Operating Procedure (SOP) is to outline the Colleges approach to using CCTV and how we will comply with GDPR / Data Protection Act (2018) and the CCTV Code of Practice. This procedure is not applicable to targeted surveillance activity.

All staff, parents and visitors should have a reasonable expectation of themselves / their children being captured on CCTV on a daily basis.

The purposes of CCTV in the Little SERC setting of the Newcastle Campus are:

- Deterring, prevention and detection of a crime including misuse/abuse of SERC equipment.
- Identification, apprehension and prosecution of offenders.
- Security of campus buildings and ground.
- Safeguarding / Health and Safety of children, staff and visitors to the creche

The Creche Manager and his/her designated appointee will be responsible for overseeing the security, restricted access, and maintenance arrangements of the CCTV system.

The Records Manager is available to provide advice and guidance on privacy implications and requests for footage.

## **SCOPE**

This procedure applies to all staff, children, parents and visitors who may be captured on CCTV.

## **OWNERSHIP OF IMAGES**

As the Data Controller, SERC owns all images captured by the CCTV at 'Little SERC'

Access to the footage is controlled by the Creche Manager.

Under no circumstances, are individuals allowed to view footage unless for a legitimate business reason and with the authority/supervision of the Creche Manager or his/her designated appointee.

## **OVERVIEW**

CCTV operates in Little SERC 24 hours a day, 7 days a week.

Equipment, location, image quality is appropriate to ensure the technology satisfies the purpose of installation.

The positioning of the CCTV system is planned to ensure maximum effectiveness and efficiency however the Little SERC cannot guarantee that all incidents will be detected.

Signs are placed at the entrance to the creche to inform staff, parents, and visitors that they/their children are entering a zone where CCTV is in operation. All signs stipulate the purpose of the CCTV surveillance, and a contact number should any person want further information regarding the system.

Cameras will not capture any area of expected privacy e.g. restrooms, changing facilities. If there is cause for CCTV to be installed in an area where there would be a heightened expectation of privacy e.g. rest rooms, signs will be prominently placed to clearly inform individuals of the presence of CCTV surveillance. Such occasions will only be carried out where there is reason to believe suspicious activity and with the advice from appropriate authorities.

Cameras do not record audio. Cameras are solely to monitor and record the movements and actions of individuals.

## **ACCESS TO IMAGES AND SECURITY**

Access to and viewing of CCTV images is restricted to the Creche Manager and his/her designated appointee who are authorised to do so in accordance with the purposes of the system.

All monitors which display images captured on CCTV are password protected and only accessible by the Creche Manager/designated appointees.

Images will remain within the custody of Little SERC and will not be 'live' streamed i.e. parents will not have remote access to 'live' images of their children.

## **VIEWING AND DISCLOSURE OF CCTV FOOTAGE**

Disclosure of images from the CCTV system is controlled and is consistent with the purpose for which the system was established. See Section 6.10 of this SOP.

Permission to view CCTV footage will not be granted to anyone whose role is not explicitly identified in this procedure. See Section 6.10 of this SOP.

Urgent requests will be processed as soon as possible i.e. where there is immediate risk to health and safety or where a crime has been suspected.

Non-urgent requests will be processed within 5 working days.

All requests for CCTV footage must be made directly to the Campus Manager who will liaise with the Creche Manager/appointee to arrange for the images to be extracted and considered for disclosure.



Requests should include:

1. Date and time the images were recorded
2. Information to identify the individual, if necessary
3. Location of the camera, if known.

All occasions of CCTV footage being viewed/released must be documented (see appendix 2) and records kept.

CCTV recordings will be viewed in a closed area by the appointed personnel only unless they explicitly give permission for another individual to be there, however their presence must be in relation to the content of the images e.g. to identify an individual.

Individuals permitted to request and view CCTV material on any campus are:

SERC Personnel

- Creche Manager / designated appointee
- College Management Team
- Campus Managers
- HR Services Manager
- HR Business Partners
- Investigating Officers
- Head of Estates / Deputy Head of Estates / Senior Projects Manager
- Head of Health and Safety
- Records Manager

**RELEASING CCTV FOOTAGE**

The College may receive requests for 'copies' of images captured on the CCTV system from individuals/external organisations.

The Campus Manager or person designated by them, will consider these requests for all campuses in line with the purpose of the CCTV system and the Data Protection Act (2018).

Where footage is being released, it must be encrypted prior to release regardless of format i.e. disc or email. Again, Appendix 2 must be completed and retained by the Campus Manager or person designated by them.

**6.12 Law Enforcement**

Should the College receive a request from any law enforcement agency, the Campus Manager, or person designated by them, and with guidance from the Records Manager will review and release the CCTV images where the content may assist with detection/prevention of a crime/terrorism as deemed appropriate.

Such agencies must provide proof of legitimacy for their request e.g. PSNI should provide a Form 81 with proof of permission to seek the footage.

**6.13 Data Subject requests**

The UK GDPR gives individuals the right to access to personal data held in relation to them by the College, this includes CCTV images. All Subject Access Requests must be made in compliance with the College Data Protection Policy. The Campus Manager/Creche Manager will arrange to view the images to assess if the release of the footage would evoke an exemption within the Data Protection Act (2018).

#### 6.14 Third Party requests

Requests for CCTV images from third parties e.g. solicitors must be referred to the Campus Manager and after guidance from the Records Manager/will arrange to view the images to assess if the release of the footage would evoke an exemption within the Data Protection Act (2018).

#### 6.15 Safeguarding

Requests in relation to a safeguarding incident supersede this SOP. Requests may be made by any member of staff in an emergency.

Staff should contact those staff named in Sections 6.10 of this SOP and efforts immediately made to assist the enquiry.

Staff who have access to the CCTV systems must comply with requests immediately.

### **7.0 RETENTION AND DISPOSAL**

All CCTV images will be retained for a maximum of 30 days unless the creche is made known of images which may assist with an investigation of an incident/crime. In such cases, relevant footage will be extracted and retained until the investigation and any subsequent appeals are complete after which it will be securely disposed of.

### **8.0 COMMUNICATION PLAN**

This procedure will be placed on the Learning Engine on the Staff Intranet, as well as being published on the SERC website. Staff will be made aware of their responsibilities during induction. Signage will also be displayed on all campuses to inform staff, parents and visitors of the presence of CCTV surveillance.

### **9.0 REVIEW**

This procedure will be reviewed (and if necessary updated) biannually or sooner if required to reflect changes in legislation or circumstance.

**CCTV VIEWING RECORD**

The use of CCTV by any organisation is regulated by the Data Protection Act (2018) as it is used to record activity of individuals and/or information relating to them e.g. car registration plate. This form must be completed by all persons at the point of viewing CCTV footage.

**\*Please note – access to CCTV material is solely restricted to the following personnel:**

- College Management Team
- Campus Managers
- Deputy Head of HR
- HR Business Partners
- Investigating Officers
- Head of Estates / Facilities Manager / Senior Projects Manager
- Head of Department
- Head of School
- Creche Manager/Designated nominee
- Head of Health and Safety
- Records Manager
- Programme Managers (TFS)

**Name / Contact Details (primary requester)**

Name: \_\_\_\_\_

Job title: \_\_\_\_\_

Department: \_\_\_\_\_

Contact number: \_\_\_\_\_

**CCTV Details**

Please detail the purpose for your request to view extracts of CCTV including dates and times of footage to be examined.

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Has CCTV material been released into your custody? Yes  No

Date footage recorded: \_\_\_\_\_

Time footage recorded: \_\_\_\_\_

Camera location: \_\_\_\_\_

**Please note, once CCTV material is released into your custody, you undertake the responsibility of Data Controller and are responsible for its security and disclosure thereafter.**

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

**(Viewer)**

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

**(Viewer)**

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

**(Viewer)**