

# CCTV Policy

## Introduction

1. A Closed Circuit Television (CCTV) System is in place in Wadham College. This system, known as the 'CCTV System', comprises a number of cameras installed at strategic locations. All of the cameras are fully operational and recorded.
2. For the purpose of this policy, the 'Owner' of the system is Wadham College.
3. For the purposes of the Data Protection Act, the 'Data Controller' is Wadham College.
4. This policy will be subject to review periodically, but at least biennially, to include consultation with interested parties.
5. Throughout this policy it is intended, as far as possible, to balance the objectives of the CCTV System with the need to safeguard the individual's rights. Every effort has been made throughout this policy to indicate that a formal structure has been put into place, including a complaints procedure.

## Objectives of this policy

The objectives of the CCTV System which form the lawful basis for the processing of data are:

6. To protect Wadham College buildings and its assets.
7. To protect the health and safety of College members and visitors.
8. To increase personal safety and reduce the fear of crime.
9. To detect, prevent and reduce incidence of property crime, public disorder and offences against people.
10. To support the police in a bid to deter and detect crime, identify, apprehend and prosecute offenders.
11. To protect members of the public and private property.

## Principles

12. The CCTV System is registered with the Information Commissioner under the terms of the Data Protection Act 1998.
13. The CCTV System is operated in accordance with the Data Protection Act 1998 and the Information Commissioner's Code of Practice at all times.
14. The CCTV System is operated in accordance with all the requirements and the principles of the Human Right Act 1998.
15. The CCTV System is operated fairly, within the law, and only for the purposes for which it was established and is identified within this policy.

16. The public interest in the operation of the system is recognised by ensuring the security and integrity of operational procedures.

### **Key Personnel and Responsibilities**

17. The Domestic Bursar is the overall manager of the CCTV System and the person responsible for ensuring the objectives and principles set out in this policy are upheld.
18. The Lodge Manager has day-to-day responsibility for the monitoring, operation and evaluation of the CCTV System and the implementation of this policy. The Lodge Manager is responsible for maintaining full management information as to the incidents dealt with in the management of the CCTV System.
19. The Head of ICT provides day-to-day IT support for the CCTV system.

### **Cameras and Area Coverage**

20. The areas covered by CCTV to which this policy refers are the buildings and grounds of Wadham College, including the Merifield and Dorothy Wadham Building complex.
21. Unless an immediate response to events is required, authorised CCTV operators are instructed not to direct cameras at an individual, their property or a specific group of individuals, without authorisation from the Domestic Bursar or Lodge Manager.
22. None of the cameras forming part of the system are installed in a covert manner. Some cameras may be enclosed within 'All weather domes' for aesthetic or operational reasons.

### **Monitoring Equipment**

23. A monitor is installed behind the counter in the Lodge. The equipment has the capability of monitoring all cameras simultaneously throughout every 24-hour period.
24. A monitor for the Merifield cameras only is installed in the Merifield Manager's office.
25. The CCTV System records the images from all cameras in real time.
26. Access to the cameras, operating controls, recording and reviewing equipment is strictly limited to:
  - a. Authorised and trained Lodge staff during working hours.
  - b. The Domestic Bursar.
  - c. Members of the ICT Department for IT support to the system.
  - d. Authorised and trained Library staff during working hours (limited to the one camera in the Library).
  - e. The Merifield Manager during working hours (limited to Merifield cameras).
  - f. The Dorothy Wadham Building Manager during working hours (limited to Dorothy Wadham Building cameras).
27. Any authorised person operating the cameras acts with utmost integrity at all times.
28. Any replay of pre-recorded data is only undertaken in the following areas:
  - a. Lodge Manager's office, located in the Lodge.
  - b. The ICT Manager's office.
  - c. The Domestic Bursar's office.
  - d. Librarian's office, located in the Library (limited to pre-recorded data from the one camera in the Library).

- e. Merifield Manager's office (limited to pre-recorded data from the Merifield cameras).
- f. Dorothy Wadham Building Manager's office (limited to pre-recorded data from the Dorothy Wadham Building cameras).

There must be a good reason for the viewing. A log of the playback is retained on file by the Lodge Manager, Librarian, Merifield Manager, or Dorothy Wadham Building Manager, together with details of the purpose and those present at the viewing.

- 29. Access to pre-recorded data is strictly limited to:
  - a. Lodge Manager and Lodge staff.
  - b. Domestic Bursar.
  - c. Sub-Deans (in appropriate circumstances).
  - d. Librarian and Assistant Librarian (limited to pre-recorded data from the one camera in the Library).
  - e. Merifield Manager (limited to pre-recorded data from the Merifield cameras)
  - f. Dorothy Wadham Building Manager (limited to pre-recorded data from the Dorothy Wadham Building cameras)
  - g. College, or other officials, by way of a written request.
- 30. Unauthorised persons do not have access to any part of the CCTV System without the authorisation of the Domestic Bursar or Lodge Manager.
- 31. All CCTV operators receive training relevant to their role. Further training is provided as necessary.

### **Privacy and Data Protection**

- 32. All personal data obtained by virtue of the system, are processed fairly and lawfully and, in particular, are only be processed in the exercise of achieving the stated objectives of the CCTV System. In processing personal data, there is total respect for everyone's right to privacy.
- 33. The storage and security of the data will be strictly in accordance with the requirements of the Data Protection Act 1998, the Information Commissioner's Code of Practice and the College's Data Protection Policy.
- 34. All data is processed in accordance with the principles of the Data Protection Act, 1998, which, in summarised form, includes, but is not limited to:
  - a. All personal data is obtained and processed fairly and lawfully.
  - b. Personal data is held only for the purposes specified.
  - c. Personal data is disclosed only to the people listed within this policy.
  - d. Only personal data is held that is adequate, relevant and not excessive in relation to the purpose it is held.
  - e. Steps will be taken to ensure personal data is accurate and where necessary, kept up to date.
  - f. Personal data is held no longer than necessary.
  - g. Individuals are allowed access to information held about them and, where appropriate, permitted to correct or erase it.
- 35. Security measures are in place to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of information.

### **Operation of the System by the Police**

36. Under certain circumstances the Police may make a request to assume direction of the CCTV System. Only written requests made under section 29 of the Data Protection Act 1998 will be considered. Any such request will only be accommodated on the authority of the Domestic Bursar or Lodge Manager.
37. In the event of such a request being permitted, only those CCTV operators who are authorised to do so will operate the CCTV System under the direction of the police officer.

#### **Maintenance of the CCTV System**

38. Provision is made for regular/periodic service checks of the CCTV equipment, which includes cleaning of any all-weather domes or housings, checks on the functioning of the equipment, and any minor adjustments that need to be made to the equipment settings to maintain picture quality.
39. The ICT Department takes full responsibility for all technical hardware aspects of the CCTV system. Should a fault develop all cameras, servers, switches and computers have maintenance and warranty agreements in place.
40. The Lodge Manager will maintain appropriate records in respect of the functioning and maintenance of the cameras.

#### **Handling of recorded material**

41. For the purposes of this policy 'recorded material' means any material recorded by, or as the result of, technical equipment which forms part of the CCTV system, but specifically includes images recorded digitally, on hard drive and by way of DVD copying, including digital video prints.
42. Subject to the equipment functioning correctly, images from the cameras are recorded throughout every 24-hour period.
43. Recorded footage is retained for a period of 30 Days.
44. Every digital recording obtained by using the CCTV System has the potential of containing recorded material, which may have to be admitted in evidence at some point during its life span. Irrespective of the format (e.g. DVD, paper copy, etc.), images obtained from the CCTV system are treated strictly in accordance with this policy from the moment they are received until their final destruction.
45. Access to, and the use of, recorded; material is strictly for the purposes defined in this policy.
46. Recorded material is not copied, sold, or used for commercial purposes or the provision of entertainment.
47. In complying with the ***National Standard for the Release of Data to Third Parties***, it is intended, as far as reasonably practicable, to safeguard individual rights to privacy and to give effect to the following principles:
  - a. Recorded material shall be processed lawfully and fairly, and used only for the purposes defined in this policy.
  - b. Access to recorded material will only take place in accordance with the procedures outlined in this policy.
  - c. The release or disclosure of data for commercial or entertainment purposes is specifically prohibited.

- d. Members of the police service or other agencies having a statutory authority to investigate and/or prosecute offences may release details of recorded information to the media only in an effort to identify alleged offenders or potential witnesses. Under such circumstances, full details will be recorded.
- 48. It may be beneficial to make use of 'real' digital recordings for the training and education of those involved in the operation and management of CCTV systems, and for those involved in the investigation, prevention, and detection of crime. Any material recorded by virtue of the CCTV system is only used for such training and education purposes.
- 49. A video print is a copy of an image or images, which already exists on a hard drive or DVD. Video prints are not taken as a matter of routine. The Domestic Bursar or, in his or her absence, the Lodge Manager must authorise any requests to make video prints from the CCTV System. There must be a good reason for the request. If a video print is made, the purpose of the request is recorded. The record will include brief details of the nature of the incident together with the location, time and date.
- 50. If a video print is required in connection with a criminal investigation, it is treated as an exhibit and dealt with in accordance with the rules of evidence in respect of continuity, disclosure, etc.

### **Copyright**

- 51. Copyright and ownership of all material recorded by virtue of the CCTV System remains with the Data Controller.

### **Access to 'Personal Data'**

- 52. The Data Protection Act 1998 provides Data Subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Request for access should be made in writing to the Domestic Bursar.

### **Public Information**

- 53. A copy of this policy is made available on request.
- 54. Warning signs are in place at access routes to College areas covered by the CCTV system. The signs indicate the presence of 24-hour CCTV monitoring.

### **Complaints**

- 55. Any complaints about the College's CCTV System should be addressed to the Domestic Bursar.

### **Breaches of this policy**

- 56. Any breach of this policy is initially investigated by the Domestic Bursar, in order for the appropriate action to be taken.

### **Domestic Bursar**

November 2025