



WYCLIFFE HALL

CCTV Policy

Bursar

Wycliffe Hall

May 2018



WYCLIFFE HALL

Contents

1. Introduction
2. CCTV system overview
3. Purposes of the CCTV system
4. Monitoring and recording
5. Compliance with Data Protection legislation
6. New installations
7. Applications for disclosure of images
8. Retention of images
9. Complaints Procedure
10. Monitoring compliance
11. Policy Review

1. Introduction

- 1.1 Wycliffe Hall “a member of the Oxford University” has in place a CCTV surveillance system “the CCTV system” on its main campus. This policy details the purpose, use and management of the CCTV system at the Hall and details the procedures to be followed in order to ensure that the Hall complies with relevant legislation and the current Information Commissioner’s Office Code of Practice.
- 1.2 The Hall will have due regard to the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, the Hall will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.
- 1.3 This policy is based upon guidance issued by the Information Commissioner’s Office, ‘In the picture: A data protection code of practice for surveillance cameras



WYCLIFFE HALL

and personal information'¹ (“the Information Commissioner’s Guidance”).

- 1.4 This policy and the procedures therein detailed, applies to all of the Hall’s CCTV systems including webcams, covert installations and any other system capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

2. CCTV System overview

- 2.1 The CCTV system is owned by the Wycliffe Hall, 54 Banbury Road, Oxford OX2 6PW and managed by the Hall and its appointed agents. Under the Data Protection Act 1998 the Wycliffe Hall is the ‘data controller’ for the images produced by the CCTV system. The Hall is registered as part of Oxford University with the Information Commissioner’s Office. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner’s Guidance.
- 2.2 The Clerk of the Works is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 2.3 The CCTV system operates across the Hall’s main sites. There are currently 4 cameras, which can be found at the Front, Rear main doors and the two side entrances of old lodge.
- 2.4 Signs are placed under all cameras to inform staff, students, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by the Wycliffe Hall and contact number is provided.
- 2.5 The Bursar is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- 2.6 Cameras are sited to ensure that they cover Hall premises as far as is possible.

¹ <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>



WYCLIFFE HALL

- 2.7 Cameras are not sited to focus on private residential areas and cameras situated in Hall residential accommodation focus on entrances and communal areas.
- 2.8 The CCTV system is operational and is capable of being monitored for 8 hours a day, 364 days of the year.
- 2.9 Any proposed new CCTV installation is subject to a Privacy Impact Assessment.

3. Purposes of the CCTV system

- 3.1 The principal purposes of the Hall's CCTV system are as follows:
 - for the prevention, reduction, detection and investigation of crime and other incidents;
 - to ensure the safety of staff, students and visitors;
 - to assist in the investigation of suspected breaches of Hall regulations by staff or students; and
 - the monitoring and enforcement of traffic related matters.
- 3.2 The CCTV system will be used to observe the Hall's main campus to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
- 3.3 The Hall seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

4. Monitoring and Recording

- 4.1 Cameras are monitored in two locations, reception and finance/bursary office. These rooms, are secured when the staff are not available.



WYCLIFFE HALL

- 4.2 Images are recorded centrally on a PDR which is located securely in an admin office of the Hall. This is viewable by authorised staff. Additional staff may be authorised by the Bursar to monitor cameras.
- 4.3 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
- 4.4 All images recorded by the CCTV System remain the property and copyright of Wycliffe Hall.
- 4.5 The monitoring of staff activities will be carried out in accordance with Part 3 of the Employment Practices Code.²
- 4.6 The use of covert cameras will be restricted to rare occasions, when a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Bursar will be sought before the installation of any covert cameras. The Clerk of the Works should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.
- 4.7 Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there is reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

² <https://ico.org.uk/media/for-organisations/documents/1064/the-employment-practices-code.pdf>



WYCLIFFE HALL

5. Compliance with Data Protection Legislation

- 5.1 In its administration of its CCTV system, Wycliffe Hall complies with the Data Protection Act 1998. Due regard is given to the data protection principles embodied in the Data Protection Act. These principles require that personal data shall be:
- a) processed fairly and lawfully;
 - b) held only for specified purposes and not used or disclosed in any way incompatible with those purposes;
 - c) adequate, relevant and not excessive;
 - d) accurate and kept up to date;
 - e) kept for no longer than necessary for the particular purpose;
 - f) processed in accordance with the rights of individuals;
 - g) kept secure; and
 - h) not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.
- 5.2 From 25 May 2018, Wycliffe Hall will also comply with the General Data Protection Regulation. Due regard will be given to the data protection principles contained within Article 5 of the GDPR which provide that personal data shall be:
- a) processed lawfully, fairly and in a transparent manner;
 - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - d) accurate and, where necessary, kept up to date;
 - e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed;



WYCLIFFE HALL

and

- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

6. Applications for disclosure of images

Applications by individual data subjects

- 6.1 Requests by individual data subjects for images relating to themselves “Subject Access Request” should be submitted in writing to the Wycliffe Hall’s Data Protection Officer with proof of identification. Further details of this process are detailed on the Wycliffe Hall website:[link needed]
- 6.2 In order to locate the images on the Hall’s system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
- 6.3 Where the Hall is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Access to and disclosure of images to third parties

- 6.4 A request for images made by a third party should be made in writing to the Bursar.
- 6.5 In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 6.6 Such disclosures will be made at the discretion of the Bursar, with reference to relevant legislation and where necessary, following advice from the Data Protection Officer.



WYCLIFFE HALL

- 6.7 Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or Bursar, the Clerk of Works may provide access to CCTV images for use in staff disciplinary cases.
- 6.8 The Clerk of Works may provide access to CCTV images to Investigating Officers when sought as evidence in relation to student discipline cases.
- 6.9 A record of any disclosure made under this policy will be held and listed, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Retention of images

- 7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 15 days from the date of recording. Images will be automatically overwritten after this point.
- 7.2 Where an image is required to be held in excess of the retention period referred to in 7.1, the Bursar or their nominated deputy, will be responsible for authorising such a request.
- 7.3 Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.
- 7.4 Access to retained CCTV images is restricted to the Clerk Of Works and other persons as required and as authorised by the Bursar.

8. Complaints procedure

- 8.1 Complaints concerning the Hall's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Bursar.
- 8.2 All appeals against the decision of the Bursar should be made in writing to the Principal.



WYCLIFFE HALL

9. Monitoring Compliance

- 9.1 All staff involved in the operation of the Hall's CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
- 9.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

10. Policy review

- 10.1 The Hall's usage of CCTV and the content of this policy shall be reviewed annually by the Bursar with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.