**CLOSED CIRCUIT TELEVISION (CCTV) POLICY**

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| **Author / Creator** | David Halliday – Head of Security and Resilience |
| **Owner** | Facilities Management Dept. |
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| **Subject / Description** | Policy statement outlining the principles for GCU installation and operation of closed circuit television. |
| **Equality Impact Assessment** |  |
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**INTRODUCTION**

The purpose of this Policy is to ensure that Glasgow Caledonian University, as the Data Controller in terms of the UK General Data Protection Regulation (UK GDPR) and Data Protection Act 2018, operates its closed circuit television systems in a manner that is compliant with the law and that the scope and responsibilities for the system are clearly defined.

**PURPOSE**

Closed circuit television is used for the purpose of public safety and security and may be used for investigations and proceedings arising under the University’s regulations, codes and policies.

**SCOPE**

This Policy governs the installation and operation of fixed closed-circuit television cameras and systems operated by Glasgow Caledonian University throughout the Glasgow City Campus including Caledonian Court student residence and London City Campus including Fashion Street and Vallance Road. This Policy will also cover the use of non-fixed cameras which may be deployed from time to time.

The Policy applies to all Glasgow Caledonian University employees and all employees of contracted out services. It also applies to all other persons on Glasgow Caledonian University property.

**POLICY**

The Policy is based on the Code of Practice for Surveillance Cameras and Personal Information issued by the Information Commissioners Office (ICO) under the Data Protection Act 2018 and the provisions of the UK GDPR.

Glasgow Caledonian University is committed to protecting the rights and freedoms of individuals, a principle which underpins this Policy ensuring that any closed circuit television system used on Campus is operated with due regard for the privacy of the individual and the University’s legal obligations under the UK GDPR, Data Protection Act 2018 and appendices 2 and 3 of the ICO Code of Practice.

**DATA PROTECTION PRINCIPLES**

Glasgow Caledonian University operates its closed circuit television systems in accordance with the Principles of the UK GDPR ensuring that personal information is collected and used fairly, stored safely and not disclosed unlawfully.

The Principles are:

* Personal data shall be processed lawfully, fairly and in a transparent manner.
* Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in any manner incompatible with those purposes.
* Personal data shall be adequate, relevant and limited to what is necessary in relation to the purpose for which it is processed.
* Personal data shall be accurate and where necessary kept up to date.
* Personal data processed for any purpose shall not be kept for longer than is necessary for that purpose.
* Personal data shall be processed in a manner that ensures appropriate security including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
* Personal data shall be appropriately secured to protect it against unauthorised or unintended losses of confidentiality, failures of integrity or interruptions to the availability of that information.

**COMPLIANCE WITH DATA PROTECTION LEGISLATION**

The University Security Manager is responsible for this policy and its implementation.

The legal basis for processing the data includes:

UK GDPR Article 6 (1)(c) compliance with a legal obligation.

UK GDPR Article 6 (1)(e) performance of a task in the public interests/exercise of official authority.

Where data is processed in connection with criminal convictions including allegations of criminal convictions a legal basis within the DPA 2018 will apply.

GCU will process CCTV in a transparent manner including providing a Privacy Notice to data Subjects and providing signage to inform visitors the purpose of CCTV and where to obtain further information including who to contact to make a complaint and how to access information. Regular checks will be undertaken to ensure the system is working properly and high quality images are processed.

Data will be used only for the purpose identified or where legally required to process the data.

GCU will address the adequacy principle by limiting CCTV to public areas of the campus so that processing is as unobtrusive as possible for the purpose. No covert recording will take place and cameras will be visible and sited in such a way that recording provides clear images. GCU will consider any impact on privacy should a business need be identified to introduce new technology or locations of CCTV.

Data will be retained no longer than necessary and will be retained exceptionally as required. Further details are set out below.

Data will be securely stored and only a limited number of authorised persons will have access to data including live images and data saved to the system.

A Data protection Impact Assessment (DPIA) has been undertaken to consider the impact on privacy and address any concerns.

**OPERATING SYSTEM**

For the purpose of this Policy, closed circuit television equipment includes cameras, transmission, monitoring and retrieval equipment as defined in BS 7958.

Glasgow Caledonian University operates a networked closed circuit television system throughout the Glasgow City Campus including Caledonian Court student residence and London City Campus overtly monitoring both public and restricted areas.

All cameras are centrally controlled and monitored 24/7 from the Security Office at Glasgow City Campus with secondary monitoring within the satellite security office at Caledonian Court, Glasgow and the London City Campus reception at both Fashion Street and Vallance Road.

The system operates 24 hours per day, 365 days per year and is continuously digitally recorded with data retained for a period of not more than 31 days following which it will be automatically erased unless there is a recorded and proportionate reason for its longer retention for a specified purpose.

**ACCESS TO RECORDED MATERIAL**

Disclosure of images to third parties will be controlled and must be consistent with the purpose for which the system was established. Any request for images and subsequent disclosure must be supported by production of a standard Personal Data Request Form and must clearly state what information is requested together with the purpose of obtaining the information *eg.* *investigation concerning the apprehension or prosecution of offenders.*

Disclosure of images to third parties will only be provided to external parties when permitted by Data Protection or other legislation and is limited to the following

* Police and other law enforcement agencies
* University management with a legitimate reason for accessing images eg. Investigating Officers conducting enquiries in relation to alleged contraventions of the University’s regulations, codes and policies.
* Legal requirement to disclose.

Where a request is made by the police or other public body to conduct covert surveillance using the University CCTV system, written authority is required under the Regulation of Investigatory Powers (Scotland) Act 2000.

**REQUEST FOR SUBJECT ACCESS**

The UK GDPR provides statutory obligation on the University in relation to subject access.

Where a potential data subject wishes to obtain access to or copies of recorded CCTV images of themselves, the subject should submit request to the University Information Compliance Section.

**RETENTION AND DISPOSAL OF RECORDED MATERIAL**

Closed circuit television recordings and other materials reproduced from the CCTV recordings shall normally be retained for a maximum period of 31 days before being automatically erased. Where an incident is recorded that could give rise to further proceedings and the recording may be relied upon, that recording will be retained for a period of 7 years from the date of recording.

Recordings and other material reproduced as part of a criminal, civil or disciplinary case will be retained for a period of 6 years following the disposal of the case.

All digitally recorded media will be securely overwritten and securely disposed as confidential waste.

**INFORMATION BREACH MANAGEMENT**

Information Incident management policies and processes have been developed to record information breaches and enable breaches to be reported. Procedures will ensure that the University is able to report any breach which is likely to result in a risk to the rights and freedoms of data Subjects to the Information Commissioner’s Office within 72 hours of becoming aware of the breach.

**COMPLIANCE**

All staff of Glasgow Caledonian University involved with closed circuit television monitoring and recording are aware of the ICO Codes of Practice and the provision of the UK GDPR and Data Protection Act 2018.

Any misuse of information obtained from closed circuit television is a breach of data protection legislation which may result in disciplinary or criminal proceedings.