

ESTATES & FACILITIES

Document Title

**New CCTV cameras
process**

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Background

The University owns a substantial CCTV system covering large parts of the University estate, a system that has grown significantly over the last 25 years. Originally there were few if any checks and balances, concerns about how personal data was being managed led in the UK to legislation such as the Human Rights Act and Data Protection Act (DPA) designed to protect an individual's rights and privacy.

Requirements

Cameras record personal data and the University has to comply with the same legislation for cameras as it does for other personal information it handles.

The requirements to justify a camera are now high and should be considered only after all other mitigations have been eliminated as insufficient

The installation of any new CCTV camera needs to be assessed by the University's Security Manager

The assessment is guided by the DPA the Surveillance Camera Commissioners guidelines and the University's CCTV and Observation Systems Policy.

The assessments will inform which of the following options is recommended

- a) No camera
- b) Other mitigation(s) to reduce the security or health & safety risk
- c) Installation of camera
- d) Installation of infrastructure for a camera (this option is often a good idea where building works are taking place and cabling and connections can be installed relatively cheaply.)

Procedure

The guiding principle here is that there needs to be a pressing need for any new camera installation, the fact a camera is wanted by the people is not justification in itself. There needs to have been incidents in the area as justification or from the changed risk profile it can be anticipated that incidents will occur.

To start with there needs to be a consultation with those that are going to be observed, alongside this an Operational Requirement and Data Protection Impact Assessment (DPIA) need to be produced, together these identify whether a camera is justified and if so its specification and any necessary safeguards.

Considerations that inform the assessment unsurprisingly are the crimes and health & safety incidents for that location.

The nature and usage of the area to be observed and the expectations of those who will be observed are also factors.

As an example the privacy expectations of those people in University Road may well be low, those in a Campus building to be medium and those in a Halls of residence to be high.

The University's Security Manager and CCTV engineers will identify the camera specification and installation method and engage with consultants and contractors, where required.