

QMSU CCTV Policy

2019

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Policy statement

Queen Mary University of London Student' Union uses Close Circuit Television ("CCTV") within the premises. The purpose of this policy is to set out the position of the Union as to the management, operation and use of the CCTV at the Students' Union premises.

This policy applies to all members of QMSU staff & visitors to any of QMSU premises and all other persons whose images may be captured by the CCTV system.

- This policy takes account of all applicable legislation and guidance, including:
- The General Data Protection Regulation ("GDPR")
- *[Data Protection Act 2018]* (together the Data Protection Legislation) (until 25th May 2018)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

This policy sets out the position of the Union in relation to its use of CCTV.

Purpose of CCTV

QMSU uses CCTV for the following purposes:

- To provide a safe and secure environment for Students, staff and visitors
- To prevent the loss of or damage to the buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offender

Description of system

QMSU sites uses fixed and moved cameras on sites. Cameras are not equipped for sound recording.

Sitting of cameras

All CCTV cameras will be located in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff, students and visitors.

Cameras will not be located, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. QMSU will make all reasonable efforts to ensure that areas outside of the QMSU premises are not recorded.

Signs will be displayed to inform individuals that they are in an area within which CCTV is in operation.

Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

Privacy Impact Assessment

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by

QMSU to ensure that the proposed installation is compliant with legislation and ICO guidance.

QMSU will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

Management & Access

The CCTV system will be managed by CS Systems and each department managers. On a day to day basis the CCTV system will be operated by staff with delegated authority as appropriate.

The viewing of live CCTV images will be restricted to members of staff in QMSU and Security with explicit authority to view images, for the reasons set out above.

Recorded images which are stored by the CCTV system will be restricted to access by members of staff in QMSU and Security with explicit authority to view images, for the reasons set out above.

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

The CCTV system is checked weekly by appropriate Departmental Managers in QMSU to ensure that it is operating effectively.

Storage & Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a period of thirty days unless there is a specific purpose for which they are retained for a longer period.

QMSU will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas;
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to specified members of staff

A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by QMSU Managers.

Disclosure of Images to Data Subjects

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request in accordance to the Data Protection Legislation. Such a request should be considered in the context of the QMSU Subject Access Request Policy.

All requests must be made in writing to the QMSU Data Protection Officer using the standard form.

QMSU will respond to requests within 30 working days of receiving the written request and fee.

When such a request is made The Department Manager together with QMUL Security will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.

If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. QMUL Security Manager or their representative must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then QMSU must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The process followed by the Estates and Facilities Manager in determining whether the images contained third parties;

- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

Disclosure of Images to Third Parties

QMSU will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images the QMSU Managers must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

Review of Policy & CCTV System

The CCTV system and the privacy impact assessment relating to it will be reviewed bi-annually.

Misuse of CCTV systems

The misuse of CCTV system could constitute a criminal offence.

Any member of staff who breaches this policy may be subject to disciplinary action.

Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by the QMSU should be made in accordance with QMSU Complaints Policy.

CCTV Request Form

Request Form

Form for individual requesting footage:

Name:	
Staff ID (if applicable):	
Contact info: Email/Mobile	
Date of request made:	
CCTV footage date being requested (estimate):	
CCTV footage time being requested (estimate):	
CCTV footage location being requested (estimate):	
Reason for request:	
If known, please provide the name of the QMSU staff member you have been in touch with or is helping you deal with this.	

Please fill it out on Google forms. Click [here](#) for the form.

Review Form

Form for staff member reviewing footage:

Name:	
Staff ID:	
Email:	
CCTV footage date being reviewed:	
CCTV footage time being reviewed:	
CCTV footage location being reviewed:	
CCTV footage date reviewed on:	
CCTV footage time reviewed on:	
CCTV footage location reviewed on:	
Findings: What have you found?	
Actions: What are the next steps?	
Signature	

Please complete the form on Google forms. Click [here](#) for the form.

Further Information

Further information on CCTV and its use is available from the following:

- www.ico.org.uk
- General Data Protection Regulation