

BALLIOL
COLLEGE
UNIVERSITY OF OXFORD

POLICY DOCUMENT
Balliol College CCTV Code of Practice

In order to fulfil its educational, pastoral, administrative and employment responsibilities and to maintain security for its students, staff, visitors and premises, the College and its Departments need to collect and process personal data. The primary monitoring facility is located at the Porters' Lodge on Broad Street and secondary facilities are situated at Holywell Manor Lodge at the Holywell Manor graduate centre on Manor Road, and also Jowett Walk Lodge at the Jowett Walk accommodation on Jowett Walk.

CCTV viewing is classed as information processing and any CCTV product is classed as data under the Data Protection Act 2018 and the College has a legal obligation to comply with the law. Information must be collected and used fairly and proportionately, stored safely and securely and not disclosed to any third party unlawfully.

Document Purpose

This document details the operating standards and procedures for closed circuit television (CCTV) systems installed at Balliol College in accordance with the requirements of:

- The Data Protection Act 2018 (DPA).
- The Home Office CCTV Code of Practice 2013 issued by the Information Commissioners Office (ICO).
- ICO data protection code of practice for CCTV and personal information 2014
- Article 8 of the Human Rights Act Right 1998 (Respect for Private and Family Life).

Operating Principles

To ensure compliance with the above, all CCTV operations must, at all times, adhere to the following principles:

- Fairly and lawfully processed.
- Processed for limited purpose and not in any manner incompatible with the purpose of the system.
- Adequate, relevant and not excessive.
- Accurate.
- Images are not retained for longer than is justifiably necessary.
- Processed in accordance with individuals' rights.
- Secure.

Operational Management

The operational management of the CCTV is the responsibility of the ICT Director (Christopher Thompson) and the Front of House Manager (Greg Butler).

Data and Privacy Protection - Responsible Persons

The College Data Protection Co-ordinator for the CCTV system and any product deriving from it is the Acting Domestic Bursar (Keeley Mortimer) who is the final decision-making authority regarding requests under the terms of the Freedom of Information Act and requests from Data Subjects (persons whose images have been recorded by the system).

The College Data Controllers are the ICT Director, the Front of House Manager, the Broad Street Lodge Manager and the Holywell Manor Lodge Manager who are responsible for safeguarding the data, preventing unauthorised access and compliance with the operating principles.

CCTV System Objectives

All cameras connected to the Balliol College CCTV system are in place for the detection of crime and for the safety of students, staff and visitors.

CCTV Control of Viewing and Access to Data

All viewing and observing of the CCTV images will be carried out in a secure, private area. No unauthorised access to the CCTV screens will be permitted at any time. Access will be strictly limited to:

- the duty Porters, Library staff (limited to library cameras only),
- ICT staff who are responsible for the CCTV infrastructure,
- the Data Controllers and the Data Protection Co-ordinator/Officer.
- the Dean, Assistant Dean and Praefectus, roles which oversee the safety and wellbeing of the student body.

Image saving to other formats such as DVD discs or memory sticks will only be carried out using the terminals in either the Lodge or IT offices. CCTV viewing or observing in other places will only take place if authorised by the Domestic Bursar. This includes remote viewing.

Any staff member working in these areas should ensure that details of any event witnessed by a staff member via live footage is only revealed to other staff members if this information is required for the '"strict performance of their duties"- this permits staff to pass on important information seen on the live footage and ensures disclosure only when there is an operational need.

All staff working in the viewing area will be made aware of the sensitivity of handling CCTV images and recordings. The Front of House Manager will ensure that all staff are fully briefed

and trained in respect of their responsibilities, operational and administrative, arising from the use of CCTV.

Each CCTV operator will be responsible for any usage of the system by them. They must ensure that all requests to show/review or produce and distribute any recorded footage has been authorised in writing by the Data Protection Coordinator or Data Controller on the CCTV Request Form designed for this purpose found at the bottom of this document.

Images are retained on a secure hard drive for up to 45 days; after this period they are automatically overwritten.

Subject to the appropriate Data Act, written request images are normally copied to a disc or memory stick which is then given to the requesting organisation or individual. In order to carry out this process, images are initially copied to a secure drive within the College system. Should there be any further requests, or if there has been a technical issue, these images are retained for two months on a secure password protected server. After two months these images will be deleted by the Data Controller.

Access to and disclosure of CCTV images

Access or disclosure requests will only be authorised by the Data Protection Officer or a Data Controller.

Requests for access to or disclosure (i.e. provision of a copy) of images recorded on the College CCTV systems from third parties will only be granted if the request comes within the following categories:

1. Data subjects (persons whose images have been recorded by the CCTV systems).
2. Law enforcement agencies.
3. An authorised College member who has responsibility for student discipline - in the course of a student disciplinary investigation.
4. An authorised member of College staff in the investigation of a Health and Safety at Work Act incident.
5. An authorised member of College staff in the investigation of crime.
6. An authorised member of College staff in the investigation of staff disciplinary issues.

7. Relevant legal representatives of data subjects.

Access to images by a law enforcement agency

Law enforcement agencies may view or request copies of CCTV images subject to providing an appropriate written Data Protection Act 2018 request and in accordance with the protocols contained within this document. In very urgent serious cases of crime or public safety, relevant law enforcement agencies may view CCTV images if requested in person and subject to authorisation by one of the Data Controllers. Subsequent written authority is to be sanctioned by the Data Protection Officer or a Data Controller if the request by law enforcement agencies to view or copy CCTV is urgent and operationally necessary. The CCTV Request Form is used for this purpose and all written requests, whether granted or refused, are filed in the Domestic Bursar's Office.

No action should be taken by any of Balliol College's CCTV operators that frustrates or delays Police enquires and prevents or obstructs their investigation. CCTV operators should comply with all reasonable requests made of them by the Police or other agencies.

If the request is declined, the Data Protection Officer or Data Controller will explain to the requesting party or representative why the request has been declined. A written and signed record using the CCTV Request Form is retained documenting the refusal and reason(s).

Access to images by an individual subject

CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act 2018. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data (subject to exemptions contained in the Act) but they do not have the right of instant access.

A person whose image has been recorded and retained and who wishes access to the data must apply in writing using the CCTV Request Form. All such applications must be made by the Data subject themselves or their legal representative. In accordance with Government guidelines a £10 search fee will be charged and is to be received by Balliol College Bursary before data is supplied.

The Data Protection Act 2018 gives the Data Protection Officer the right to refuse a request for a copy of any data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, or the images have been erased. If a data subject access request is refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

System Description

Any changes or additions to the system will be in compliance with the Data Protection Act 2018 and the Information Commissioners Office CCTV code of practice.

Balliol College CCTV has a number of IP cameras on site with images being transmitted to a secure server for storage and for recall at a later date, with a live feed being streamed from the server to the Broad Street Lodge, Holywell Manor Lodge and Jowett Walk Lodge.

The system comprises: Fixed Position Cameras; Monitors: Multiplexers; Digital Recorders; Information Signs.

Cameras are located at strategic points at the following points around Balliol College sites:

St Cross
Holywell Manor
Broad Street
Broad Street Library
Broad Street Computer Suite
Jowett Walk
Masters Field

These are principally at the entrance and exit point of sites and buildings. The system is not capable of recording audio.

There are signs prominently placed at strategic points and at entrance and exit points informing people that a CCTV installation is in use.

CCTV images are retained for up to 45 days, after this period the system automatically overwrites the existing data on a rolling basis.

System Registration

Balliol College CCTV system is registered with the Information Commissioners Office - Data Protection Register: **REGISTRATION NUMBER Z7323316**

The existence of this policy and information on access and applications for copies of CCTV data should published on the college website and advertised to all college members.

A separate document (Appendix to this Code of Practice) will be produced which details the operational requirement of each CCTV camera, justifying its position and providing a snapshot of the camera view. This document is not publicly available due to it being a

commercially sensitive document.

All additions or alterations to the current CCTV camera equipment must be authorised by the Data Protection Officer and the relevant Appendix amendments made by a Data controller.

Code of Practice / Policy and Procedures Review
(Reviewed annually as per ICO guidelines)

Written: March 2021

Reviewed March 2022

Reviewed and Updated March 2023:

- Additional cameras online at Master's Field Development
- Camera in Holywell Manor Garden moved due to obstructed view
- Camera in Law Library online

Reviewed and Updated March 2024:

- Additional camera added to Broad Street Bike Shed
- Domestic Bursar changed from Frances Wright to Jennifer Smith

Reviewed and Updated March 2025:

- Some text changed to include the monitoring station at Jowett Walk Lodge

Reviewed and Updated June 2026:

- Domestic Bursar changed from Jennifer Smith to Acting Domestic Bursar Keeley Mortimer
- Updated form for Police requests to see CCTV footage
- Updated form for general requests to see CCTV footage

Next Review due: March 2027

Greg Butler, Front of House Manager

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POLICE REQUEST FOR CCTV IMAGES / FOOTAGE

Requesting Officer Details

Officer Name:

Rank:

Collar/Warrant Number:

Police Force:

Station:

Telephone:

Email:

Investigation Details

Crime Reference Number:

Offence Being Investigated:

Location of Incident:

Date of Incident:

Time of Incident:

CCTV Requested

Camera Location(s):

Date(s) Required:

Time(s) Required:

Please indicate:

☐ Still Images

☐ Video Footage

☐ Both

Reason why CCTV is required:

Lawful Basis

I confirm that this request is made for the prevention or detection of crime, the apprehension or prosecution of offenders, or another lawful policing purpose, and that the information requested is necessary and proportionate.

Officer Signature:

Date:

CCTV Operator Use Only

Request Received By:

Date Received:

Identity Verified:

☐ Yes

☐ No

Footage Reviewed By:

Footage Released:

☐ Yes

☐ No

Date Released:

Method of Transfer:

☐ Secure Email

☐ Encrypted USB

☐ Secure Portal

☐ Other _____

Media Reference Number:

Retention Date (if applicable):

Authorising Manager:

Signature:

Date:

CCTV IMAGE REQUEST / SUBJECT ACCESS REQUEST FORM

This form should be completed by any individual wishing to access CCTV images of themselves or requesting disclosure for another lawful purpose.

Applicant Details

Full Name:

Address:

Postcode:

Telephone:

Email:

Date of Birth (optional, for identification):

Request Details

Date of Incident:

Approximate Time:

Location:

Please describe yourself (clothing, appearance etc.) to help identify you:

Reason for Request:

☐ Subject Access Request (I wish to see images of myself)

☐ Insurance Claim

☐ Civil Proceedings

☐ Other (please specify)

Please provide any additional information which may assist in locating the footage:

Identity Verification

Please provide proof of identity and address.

Examples include:

Passport or Driving Licence
Utility Bill or Bank Statement (within the last three months)

Documents Provided:

Declaration

I confirm that the information provided is accurate and understand that CCTV images containing identifiable third parties may be redacted, restricted or withheld where required by data protection legislation.

Signature: