



LONDON SCHOOL
OF SCIENCE & TECHNOLOGY

POLICY & STANDARDS FOR CCTV OPERATION AT LSST

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Policy Statement

The College seeks to ensure, as far as is reasonably practicable, the security and safety of all students, staff, visitors and contractors, whilst within or situated on the premises. To this end, CCTV cameras and recording devices are deployed within College to assist in the prevention, investigation and detection of crime, apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings), public, employee and student safety and monitoring security of premises at LSST.

This Policy document has been implemented to ensure that the deployment and control of CCTV resources is proportionate and lawful under the terms of the **Data Protection Act 1998 and the CCTV Codes of Practice.**

1. Introduction:

This document details the operating policy and standards for the closed circuit television (CCTV) systems installed at LSST in accordance with the requirements of the Data Protection Act 1998 (DPA) and the Code of Practice (CCTV Code) issued by the Information Commissioner.

The operational requirements for the CCTV systems and each camera in use across the College are to be documented in a “CCTV Operational Report”, kept and maintained by the Head of Operations.

1.1. System Description:

The CCTV systems installed in the College comprises of fixed cameras. These cameras provide fields of view encompassing approaches to College entrance, and internal communal and secure areas. The majority of the CCTV cameras are networked for remote operation from a centralised Security Control room where digital hard disk recorders provide data management and recording facilities. Where software remote view facilities are provided to named systems users elsewhere at the College, access to the systems are password protected.

1.2. Purpose of the System:

The purpose of the CCTV systems in use at LSST is to enable the prevention, investigation and detection of crime and monitoring of the security and safety of the premises at LSST.

1.3. Operating Principles:

To ensure compliance with DPA, personal data, including images recorded on the CCTV systems, must at all times be processed in line with the following Data Protection Principles:

- Fairly and lawfully processed;
- Processed for limited purposes and not in any manner incompatible with the purpose of the systems;
- Adequate, relevant and not excessive;
- Accurate;
- Not kept for longer than is necessary;
- Processed in accordance with individuals’ rights;
- Secure; and
- Not transferred to countries outside of the EEA without adequate protection.

1.4. To Whom this Document Applies:

LSST (the “Data Controller”) and its employees who operate, or supervise the operation of the CCTV systems at LSST; namely Security Officers and any authorized persons.

2. Policy:

2.1. Scope:

2.1.1. This Policy applies to all parts of the College.

2.1.2 These systems are used for the purposes of monitoring room usage and to assist with the use of the audio visual equipment. The owners of these systems are responsible for ensuring appropriate signage is displayed in the areas of use explaining the purpose of their cameras & CCTV System.

2.2. Personal Data (i.e. Images of individuals obtained by the LSST (CCTV systems) may only be used in connection with the purpose set out in section 1.2.

2.3. The ability to view live and historical CCTV data available via network software is only to be provided at designated locations and to authorised persons only. The Head of Operations is responsible for the evaluation of such locations and authorised persons against the requirements of this Policy document and is to maintain a record of all locations and authorised persons.

2.4. Except where a request has been granted for third party access to certain specified recorded CCTV images (see below), CCTV images are not to be displayed in the presence of any unauthorised person or where such images may be inadvertently viewed by any unauthorised person. Where images are accessed or monitored on workstation desktops, the CCTV screen is to be minimised when not in use or unauthorised persons are present. Workstation screens must always be left locked out when unattended.

2.5. For the purpose of viewing CCTV images, an authorised person is defined as an employee or appointed person acting on behalf of LSST who has an operational responsibility for the prevention, investigation and detection of crime and / or the monitoring of the security and safety of the premises at LSST.

2.6. No images may be captured from areas in which individuals would have an expectation of privacy (i.e. toilets, changing facilities etc.).

2.7. At all times the operation of the CCTV systems are to be conducted in accordance with the procedures set out in this document.

2.8. The Head of Operations is responsible for ensuring that CCTV system and camera specifications for new installations at LSST with the DPA and the CCTV Code.

2.9. Only the appointed contractor for the College’s CCTV systems may be used in installing or maintaining CCTV systems.

2.10. Changes in the use of the CCTV systems may only be implemented in accordance with the DPA and the CCTV Code. The Head of Operations must be consulted before any changes take place.

3. Operating Standards:

3.1. Processing CCTV Images:

It is imperative that access to, and security of the images is managed in accordance with the requirements of the DPA and the CCTV Code. At all times the following standards are to be applied:

- 3.1.1. CCTV images not to be retained for longer than necessary. Data storage is automatically managed by the CCTV digital records which use software programmed to overwrite historical data in chronological order to enable the recycling of storage capabilities. This process produces an approximate 28 day rotation in data retention.
- 3.1.2. Provided that there is no legitimate reason for retaining the CCTV images (such as for use in legal proceedings), the images will be erased following the expiration of the retention period.
- 3.1.3. If CCTV images are retained beyond the retention period, they are to be stored in a secure place to which access is controlled and are to be erased when no longer required.

3.2. Quality of Recorded Images:

Images produced by the recording equipment must be as clear as possible in order that they are effective for the purpose for which they are intended. The standards to be met under the CCTV Code are set out below.

- Recording features such as the location of the camera and/or date and time reference must be accurate and maintained.
- Cameras must only be situated so that they will capture images relevant to the purpose for which the system has been established.
- Consideration must be given to the physical conditions in which the cameras are located i.e. additional lighting or infrared equipment may need to be installed in poorly lit areas.
- Cameras must be properly maintained and serviced to ensure that clear images are recorded and a log of all maintenance activities kept.
- As far as practical, cameras must be protected from vandalism in order to ensure that they remain in working order. Methods used may vary from positioning at height to enclosure of the camera unit within a vandal resistant casing.

3.3. Appropriate Signage:

Signs must be placed so that members of the public are aware that they are entering a zone which is covered by CCTV cameras. Such signs must:

- Be clearly visible and legible
- Be of a size appropriate to the circumstances

4. Access to / Disclosure of CCTV Images:

Requests for access to, or disclosure of (i.e. provision of a copy), of images recorded on

the CCTV systems from third parties (i.e. unauthorised persons) will only be granted if the requestor falls within the following types of person / organisation:

- Data Subjects (i.e. persons whose images have been recorded by the CCTV (systems))
- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry)
- Prosecution agencies (including Scholl Directors in the course of Staff or Student disciplinary proceedings)
- Relevant legal representatives of data subjects

The contact point indicated on the CCTV signs around LSST should be available to members of the public during normal business hours. Employees staffing the contact point are to be familiar with this document and the procedures to be followed in the event that an access request is received from a Data Subject or a Third Party.

4.1. Request from a Data Subject for Access / Disclosure:

Data Subjects (i.e. persons whose images have been recorded by the CCTV systems) have various rights under the DPA, including the right to be informed that personal data (i.e. images of themselves) are being recorded and the right to view such images. Should any person visiting LSST have any questions concerning the operation of the CCTV systems or their rights with respect to any images of them recorded by the systems, the following procedure must be complied with:

- 4.1.1. The Data Subject should be directed to an authorised person (normally the duty Security Officer).
- 4.1.2. The Data Subject is to be provided with a copy of the Information Leaflet attached at Annex A (which describes the purpose and operation of the CCTV systems at LSST).
- 4.1.3. The Data Subject is to be provided with a copy of the Subject Access Request Form attached at Annex B, this will enable them to make a formal request to view / receive copies of images of themselves.
- 4.1.4. The Data Subject is to send the completed Subject Access Request Form to the CEO of the College.
- 4.1.5. The Head of Operations will liaise with the CEO for access to the following Information.
 - Determine whether the request should be complied with
 - Ensure that the relevant images are located
 - Determine whether third party images (i.e. images of persons other than the Data Subject) are contained within the images
 - Ensure that any third party images are disguised or blurred before access or disclosure is granted
- 4.1.6. The CEO of the College must ensure that a written acknowledgement is sent to the Data Subject as soon as practicable after receipt of the completed Subject Access Request Form. The written acknowledgment is to contain the following:
 - The name of the Data Subject
A request for further information to enable identification of the Data Subject or the relevant images (if necessary)
 - A confirmation of the start date for the response period (see below);

- The name and signature of the CEO of the College

4.1.7. Subject Access Requests are to be processed as soon as practicable and in any event within 40 days of the latter of the receipt of sufficient information to enable identification of the Data Subject and / or relevant images,

4.1.8. Once the images have been located and the CEO of the College and the Head of Operations agreed that a Subject Access Request can be complied with, the CEO of College must provide the Data Subject with written notice containing the following:

- The name of the Data Subject
- A description of personal data (i.e. images of the Data Subject recorded on the CCTV systems at LSST between (insert time) on (insert date))
- If the Data Subject elected in their completed Subject Access Request Form to view the images at LSST, an invitation to contact the CEO of the College to arrange a viewing of the images during normal business hours
- If the Data Subject elected in their completed Subject Access Request Form to receive a copy of the relevant images, references to a CD-ROM being enclosed which contains the relevant images of the Data Subject and the blurring of any third party images (if applicable)
- The name and signature of the CEO of College

4.1.9. If the Data Subject elected in their completed Subject Access Request Form to view the images at LSST an entry needs to be made in the CCTV Operating Log Book recording:

- The name(s) of the Data Subject and all other attendees
- The date and time of the viewing
- The location where the viewing took place

4.1.10. If the CEO of College and the Head of Operations agree that a Subject Access Request cannot be complied with, the CEO of College and Information Access must provide the Data Subject with written notice containing the following:

- The name of the Data Subject
- The reason for refusing to grant access to / supply the images requested (i.e. compliance with the request would, or would be likely to, prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders; the images have already been erased etc.).
- The name and signature of the CEO of the College and Information Access.

4.2. Request from a Data Subject to Prevent Processing / Automated Decision Taking:

In addition to rights of access, Data Subjects also have rights under the DPA to prevent processing (i.e. monitoring and recording CCTV images) likely to cause substantial and unwarranted damage to that person, or prevent automated decision taking (i.e. through the use of visual recognition software) in relation to that person. It is unlikely that either ground would apply to the operation of the CCTV systems at LSST. However, should any person visiting LSST have any concerns regarding the operation of the CCTV systems, the following procedure must be complied with:

4.2.1. The Data Subject should be directed to CEO of the College and Information Access to determine whether the Data Subject is making a request to prevent processing or automated decision making. If CEO of the College and Information Access determines

that the Data Subject is instead making a Subject Access Request, the procedure set out in paragraph 4.1 above will be followed.

4.2.2. The CEO of the College and Information Access will liaise with the Head of Operations to determine whether the access / disclosure is necessary for the prevention, investigation and detection of crime, or the apprehension and prosecution of offenders, and whether the request should therefore be complied with.

4.2.3. The CEO of College and Information Access must ensure that a written acknowledgement is sent to the Data Subject as soon as practicable and in any event within 21 days of receiving the request containing the following:

- The name of the Data Subject;
- Either a confirmation that: LSST will comply with the request to prevent processing of the CCTV images likely to cause substantial and unwarranted damage to the Data Subject; or that;
- LSST will not comply with the request to prevent processing of the CCTV images likely to cause substantial and unwarranted damage to the Data Subject and the reasons for this decision; or that;
- No automated decision in respect of the CCTV images has been made by LSST

4.3. Request from a Third Party for Access / Disclosure:

Unlike Data Subjects, third parties who wish to have access to, or a copy of, CCTV images (i.e. images not of the person making the request) do not have a right under the DPA to access, and care must be taken when complying with such requests to ensure that neither the DPA or the CCTV Code are breached. As noted above, requests from third parties will only be granted if the requestor falls within the following categories:

- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry (see para 5 for further details)
- Prosecution agencies (including College Managers in the course of Staff or Student disciplinary proceedings)
- Legal representatives of the Data Subject

In order to ensure compliance with the DPA and the CCTV Code the following procedure must be complied with:

4.3.1. The Third Party should be directed to an authorised person (normally a member of the Security Staff).

4.3.2. The Third Party must be provided with a copy of the Third Party Request Form attached as Annex C (to enable them to make a formal request to view / receive copies of images of them, which they can either complete there and then or take away and send back).

4.3.3. Any completed Third Party Request Form must then be given to the Head of Operations to pass on to CEO of the College and Information Access.

4.3.4. The Head of Operations will liaise with CEO of the College Information Access to:

- Determine whether the request should be complied with, including whether a request for the provision of the storage media on which images are saved should be complied with
- Ensure that the relevant images are located

- Determine whether third party images (i.e. images of persons other than the intended Data Subject) are contained within the images
 - If applicable, ensure that any third party images are disguised or blurred before access or disclosure is granted
- 4.3.5. Once the images have been located and the Archives, Records and Information Access and the Head of Security have agreed that a Third Party Request can be complied with, CEO of the College and Information Access must provide the Third Party with written notice containing the following:
- The name of the Third Party
 - The date of receipt of the completed Third Party Request Form
 - A description of personal data (i.e. images of the Data Subject(s) recorded on the CCTV systems at LSST between (insert time) on (insert date))
 - If the Third Party elected in their completed Third Party Request Form to view the images at LSST, an invitation to contact the CEO of College, and Information Access to arrange a viewing of the images during normal business hours
 - If the Third Party elected in their completed Third Party Request Form to receive a copy of the relevant images, references to a CD-ROM being enclosed which contains the relevant images of the Data Subject and the blurring of any third party images (if applicable)
 - The name and signature of CEO of the College and Information Access.
- 4.3.6. If the Third Party elected in their completed Third Party Request Form to view the images at LSST, an entry needs to be made in the CCTV Operating Log Book recording:
- The name(s) of the Third Party and all other attendees
 - The date and time of the viewing
 - The location where the viewing took place
- 4.3.7. If the CEO of the College and Information Access and the Head of Operations agrees that a Third Party Request cannot be complied with, the CEO of the College and Information Access must provide the Third Party with written notice containing the following:
- The name of the Third Party;
 - The date of receipt of the completed Third Party Request Form;
 - The reason for refusing to grant access to / supply the images requested (i.e. compliance with the request would, or would be likely to, prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders; the images have already been erased etc.); and
 - The name and signature of the CEO of the College and Information Access.

5. Disclosure to the Police:

- 5.1. If identified, CCTV footage will be freely shared with the police to aid them in the pursuit of an investigation into criminal activity against the premises or personnel of LSST. In all cases an entry needs to be made in the CCTV Operating Log Book recording:
- The name of the Police Officer receiving the copy of the recording
 - Brief details of the images captured by the CCTV to be used in evidence
 - The crime reference number

- Date and time the images were handed over to the Police
- 5.2. Where information is requested from the police in pursuit of an investigation unrelated to criminal activity against the premises or personnel of LSST will only make such disclosures on receipt of a Section 29 Data Protection Act Form signed by a Senior Police (inspector or above) and once satisfied of the following:
 - That the purposes are indeed those relating to crime
 - That failure to release would prejudice the Police investigation

In all cases an entry needs to be made in the CCTV Operating Log Book recording:

- The name of the Police Officer receiving the copy of the recording
- Brief details of the images captured by the CCTV to be used in evidence
- The crime reference number
- Date and time the images were handed over to the Police

6. Monitoring Compliance with the DPA and the CCTV Code

An annual assessment will be undertaken by the Head of Operations and the CEO of the College and Information Access to evaluate the effectiveness of the CCTV systems at London School of Science & Technology and its compliance with the DPA and the Code. The results of the report will be assessed against the stated purpose of the scheme. If the scheme is not achieving its purpose, remedial action must be undertaken to modify the systems. Requests from members of the public for access to such reports will be considered by the CEO of the College, Records and Information Access on a case-by-case basis under the requirements of the “Freedom of Information Act”.

7. Complaints Procedure

Records of all complaints, and any follow up action, will be maintained by the CEO of the College and Information Access in accordance with the guidelines set out by the College in regards to complaints received under Freedom of Information (FOI) requests. Details of this procedure can be found on the University Web Site at:

Annex A to Policy & Standards for CCTV Operation LSST

INFORMATION LEAFLET FOR THE OPERATION OF CCTV AT LSST

This leaflet contains information and advice about the operation and management of the closed circuit television (CCTV) systems at LSST. It also provides information relating to your rights under the Data Protection Act 1998 (DPA).

Why do we have CCTV at LSST?

The purpose of the CCTV systems are to enable the prevention, investigation and detection of crime, apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings), public, employee and student safety and monitoring security of premises at LSST.

How is it controlled?

The DPA provides a legal framework under which all personal data relating to individuals is processed, which extends to the recording of images on CCTV systems. The governmental authority that oversees and enforces the DPA, the Information Commissioner, has also issued a code of practice that specifically applies to CCTV (CCTV Code). To ensure compliance with the DPA and the CCTV Code, LSST have introduced policies and procedures under which the CCTV systems at LSST are to be operated. This Policy addresses issues such as who may have access to the monitoring and data storage equipment and contains guidelines for the operators to ensure that individual's privacy is respected.

How does it operate?

The systems are operated by LSST and monitored 24 hours a day, every day of the year. Images from the cameras are recorded and held for a minimum of 28 days. If there is no legitimate reason to keep the recording, the data is erased thereafter.

Who uses the images?

Access to the images recorded by the CCTV cameras is restricted and images can only be disclosed in accordance with the DPA and the CCTV Code. As a consequence, persons who are not involved in the operation or supervision of the CCTV systems at LSST will only be granted access to, or disclosure of, the recorded images where such access or disclosure is necessary for the prevention, investigation and detection of crime, or the apprehension and prosecution of offenders. In every case LSST requires a written request to be made setting out the reason(s) for which the images are required. Normally disclosure will only be granted to the following third parties:

- Law enforcement agencies;
- Prosecution agencies; and
- Relevant legal representatives.

Can I see the images?

You are entitled to access personal information which is held about you by a third party, which extends to images of you recorded by the CCTV systems at LSST. If you wish to exercise your right to see such images you will need to complete a Subject Access request form, available from all LSST. In order for us to be able to locate the relevant images on the Subject Access request form you must be able to clearly identify yourself and the date, time, location in which you think you were recorded. Remember that images will ordinarily be erased after 28 days. LSST will respond within 40 days of receiving the required information and search fee either identifying the steps taken to comply with the request, or setting out the reasons for refusing the request.

How do I make a complaint?

If you require further information about any aspect of the CCTV systems or you wish to make a complaint, please contact LSST using the details at the foot of this leaflet.

Is LSST's CCTV effective?

CCTV has a wide range of uses and is only part of a number of initiatives LSST use to ensure the safety and security of our premises and of the people accessing them.

For further information write to:

The Head of Operations

Annex B to Policy & Standards for CCTV Operation at LSST

**DATA PROTECTION ACT 1998 - SUBJECT ACCESS
REQUEST FORM CCTV AT LSST**

*(Please use BLOCK CAPITALS to complete this
Form)*

The Data Protection Act 1998 (DPA) provides Data Subjects (individuals to whom “personal data” relates) with a right to access personal data held about themselves, including images recorded on closed circuit television (CCTV) systems.

To enable LSST to deal promptly with your request for access, please complete the form, giving as much information as possible to help us identify your personal data.

Under the terms of the DPA, LSST has 40 days to comply with your request. This time period will ordinarily commence on the date that your completed form, containing sufficient information to enable LSST.

1. PERSONAL DETAILS OF THE DATA SUBJECT

Title Surname

First Name(s)

Date of Birth / / Male / Female

Permanent Residential Address

Post Code

Daytime Telephone Number

2. INFORMATION REQUIRED TO LOCATE IMAGES

In order for LSST to identify the images you require access to, please provide the following information:

The exact date(s), time(s) and location(s) of the CCTV systems camera(s) which captured the footage required:

.....
.....
.....

Sufficient personal characteristics to enable identification of the Data Subject (a full description including hair colour, clothing etc) together with a photograph; Please use a separate sheet of paper if necessary:

.....
.....
.....

3. ACCESS TO IMAGES

Assuming LSST is able to locate the required images, please select (X) which of the following will satisfy your request:

- I would like to view the relevant images at LSST
- I would like to be sent a copy of the relevant images

4. ACKNOWLEDGEMENT

I acknowledge that it may be necessary for LSST to contact me in order to obtain further information in order to be satisfied as to my identity or to locate my personal data.

I acknowledge that if LSST is of the opinion that complying with this request would, or would be likely to, prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders, LSST has the right under the DPA to decline this request.

Signature _____ Date

Return this form to:

The Head of Operations
London School of Science & Technology
1-4 Alperton House
Bridgewater Road
Wembley, Middlesex HA0 1EH

Annex C to Policy & Standards for CCTV Operation at LSST

**DATA PROTECTION ACT 1998 – THIRD PARTY
REQUEST FORM CCTV AT LSST**

*(Please use BLOCK CAPITALS to complete this
Form)*

The Data Protection Act 1998 (DPA) regulates the processing of personal data relating to Data Subjects (individuals to whom “personal data” relates), including images recorded on closed circuit television (CCTV) systems.

Access to the images recorded by the CCTV cameras is restricted and images can only be disclosed in accordance with the DPA and the code of practice issued by the governmental authority that oversees and enforces the DPA, the Information Commissioner (formerly the Data Protection Commissioner that specifically applies to CCTV (CCTV Code). As a consequence, persons who are not involved in the operation or supervision of the CCTV systems at LSST will only be granted access to, or disclosure of, the recorded images where such access or disclosure is necessary for the prevention, investigation and detection of crime, or the apprehension and prosecution of offenders.

**1. DETAILS OF THE THIRD PARTY
APPLICANT**

Title Surname

First Name(s)

Incident Number (if applicable)

Organisation Name

Organisation Address

Post Code

Daytime Telephone Number

Please select (X) which of the following types of organisation you are applying on behalf of:

Law enforcement agency

Prosecution agency

Legal representative

Other (please Specify)

2. PERSONAL DETAILS OF THE DATA SUBJECT (IF APPLICABLE)

Title Surname

First Name(s)

Date of Birth / / Male / Female

3. INFORMATION REQUIRED TO LOCATE IMAGES

In order for LSST to identify the images you require access to, please provide the following information:

The date, time and location of the CCTV systems camera which captured the footage required:

.....
.....

Sufficient personal characteristics to enable identification of the Data Subject (if applicable) include a full description including hair colour, clothing etc together with a photograph (if possible). Please use a separate sheet of paper if necessary:

.....
.....
.....

5. ACCESS TO IMAGES

Assuming LSST is able to locate the required images, please select (X) which of the following will satisfy your request:

- I would like to view the relevant images at LSST
- I would like to be sent a copy of the relevant images

6. ACKNOWLEDGEMENT

I acknowledge that it may be necessary for LSS Try to contact me in order to obtain further information in order to be satisfied as to my identity or to locate the requested images.

I acknowledge that LSST has the absolute discretion to determine whether a request for access to, or disclosure of, the images recorded on the CCTV systems at LSST is necessary for the prevention, investigation and detection of crime, or the apprehension and prosecution of offenders.

I acknowledge that if LSST is of the opinion that complying with this request would, or would be likely to, prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders, LSST has the right decline this request.

Signature Date / /

