

## Security CCTV Policy

**TYPE:** Policy

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**PURPOSE:** Give guidance and direction on the use and management of CCTV and Body Worn Video (BWV)

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**SCOPE:** Staff, Students, Visitors and Third parties

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**RESPONSIBILITY:** Estates Team have the responsibility for physical security of staff, students, buildings, and contents and to investigate breaches of such policies (and the authority to delegate that responsibility) and the authority to develop, authorise and promulgate policy and procedures relating to such matters.

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Data Protection Act 1998, the ICO's CCTV Code of Practice 2014, the Regulation of Investigatory Powers Act 2000, Private Security Industry Act 2001, Protection of Freedoms Act 2012, and the Human Rights Act 1998.

### 1.0 Purpose

- 1.1 Closed circuit television (CCTV) surveillance is an increasing feature of daily life, deployed in a variety of areas to which members of the College and public alike have free access.
- 1.2 The purpose of this policy is to outline the College approach to the use of CCTV systems for security purposes across the group and to comply with the requirements of the Data Protection Act 1998, the ICO's CCTV Code of Practice 2014, the Regulation of Investigatory Powers Act 2000, Private Security Industry Act 2001, Protection of Freedoms Act 2012, and the Human Rights Act 1998.
- 1.3 Effective use of CCTV will also facilitate effective implementation of the College's other policies and lead to the resolution of complaints, disciplinary procedures, and prosecutions more quickly.

### 2.0 Scope

- 2.1 This policy applies to CCTV and other systems which capture images of identifiable individuals operated for the purposes of promoting security and to identify criminal activity whether occurring, anticipated, or perceived to enhance the safety and wellbeing of staff, students, and visitors. It also applies to information relating to individuals for the purposes of monitoring activities on College's premises, car parks and other public areas.
- 2.2 The planning and design of CCTV systems has been undertaken to ensure maximum effectiveness and efficiency but cannot guarantee to cover or detect every incident occurring within the areas covered.

- 2.3 This policy also covers body worn video cameras and specific arrangements for their use are covered in Appendix 1.
- 2.4 The use of conventional cameras, surveillance cameras and CCTV for other purposes including for artistic, administrative, educational or research purposes is not covered by this policy.

### **3.0 Policy Statements**

- 3.1 The College shall be responsible for all CCTV operated upon its estate and shall be the Data Controller for the requirements of the Data Protection Act 1998 ensuring that all obligations are met.
- 3.2 The Estates department is responsible for the operation and management of the College's Security CCTV systems.
- 3.3 The College's shall ensure that its notification to the Data Protection Register includes the use of CCTV.
- 3.4 All operators of CCTV systems shall be appropriately trained.
- 3.5 Appropriate procedures shall be created and followed for the use of CCTV systems with recording, viewing and retention of images undertaken in accordance with approved relevant standards.
- 3.6 Fixed CCTV shall not routinely be used to record conversations unless specified and signposted otherwise.
- 3.7 The College shall not undertake covert surveillance without expressing authorisation from the Principal or their appointee and approval of the Director of Student Services, the Director of Estates, and the Data Protection Officer. It shall ensure that any such surveillance is compliant with relevant legislation as referred to in paragraph 1.2 above.
- 3.8 The College shall deploy appropriate equipment which enables the capture of images adequate for the purpose for which they are being collected.
- 3.9 Camera siting shall, similarly, be appropriate for the purpose.

### **4.0 Applications for disclosure of images**

- 4.1 Requests by individual data subjects for images relating to themselves "Subject Access Request" should be submitted in writing using "Appendix 2 Request for CCTV Image - Subject Access Request Form" to the College Complaints together with proof of identification.
- 4.2 To locate the images on the Colleges Camera system, sufficient detail must be provided by the data subject to allow the relevant images to be located and the data subject to be identified.
- 4.3 Where the College is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

## **5.0 Access to and disclosure of images to third parties**

- 5.1 A request for images made by a third party should be made in writing to the Director of Student Services and Director of Estates
- 5.2 In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 5.3 Such disclosures will be made at the discretion of the Director of Student Services or Director of Estates, with reference to relevant legislation and where necessary, following advice from the College's Director of Risk Control and Compliance
- 5.4 Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the Director of Estates may provide access to CCTV images for use in staff disciplinary cases.
- 5.5 The Head of Security may provide access to CCTV images to Investigating Officers when sought as evidence in relation to student discipline cases.
- 5.6 A record of any disclosure made under this policy will be held on the CCTV management file, itemising the date, time, camera, requestor, authoriser, and reason for the disclosure.

## **6.0 Retention of images**

- 6.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.
- 6.2 Where an image is required to be held in excess of the retention period referred to in 6.1, the Director of Governance, Risk and Compliance or their nominated deputy, will be responsible for authorising such a request.
- 6.3 Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.
- 6.4 Access to retained CCTV images is restricted to the Director of Estates and other people as required and as authorised by the Director of Estates.

## **7.0 Complaint's procedure**

- 7.1 Complaints concerning the College's use of its CCTV system or the disclosure of CCTV images should be made in writing to [quality@solihull.ac.uk](mailto:quality@solihull.ac.uk)
- 7.2 All appeals against decisions should be made in writing to [quality@solihull.ac.uk](mailto:quality@solihull.ac.uk)

## **Appendix 1: Arrangements for the Use of Body Worn Video Cameras (BWV)**

Body worn video cameras (BWV) are CCTV cameras attached to the uniforms of security staff. These cameras recorded both audio and visual footage.

### **Purposes of BWV**

- BWV are used at all sites operated by Solihull College and University Centre to enable the recording of incidents where video footage will be beneficial to:
- increase reassurance of members of the College community.
- reduce crime and disorder and the fear of crime and disorder.
- reduce antisocial behaviour.
- ensure that the College campus is a safe and secure environment to work and study.
- increase the safety of security staff.
- reduce escalation of incidents; and
- resolve complaints about security incidents and disciplinary procedures, internally, and prosecutions, externally, more quickly.

### **Principles of Use**

- Body worn video cameras (BWV) should only be used by college security staff, duty managers and any other designated staff: any change to this arrangement must be agreed by the Director of Estates or another member of the SLT/EMT.
- All BWV shall be managed by the College security teams. The Campus Services Manager shall be responsible for the use and for training of staff in its use.
- All staff who may use BWV will have full training in their use. No staff will be permitted to use BWV until they have agreed to these principles, confirming their receipt, reading, and understanding.
- BWV will only be used when determined operationally necessary in support of the purposes outlined above by the Director of Estates or their appointed nominees.
- All incidents which involve the use of body one camera shall be logged, documenting the date, time, reason for use, name of authoriser and name of the officer wearing the BWV.
- The officer wearing BWV is always responsible for its use.
- BWVs should never be used covertly or concealed.
- The security will use a documented BWV footage management system; this system will be compliant with all relevant legislation and provide a full audit trail for the footage to ensure its evidential value.
- Footage on the camera will then be deleted. Footage will be retained for 30 days unless required for the purpose of an investigation.
- Every six months, use of BWV shall be reviewed and the BWV footage management system will be audited.

## Appendix 2: Request for CCTV Image - Subject Access Request Form

The information that you supply via this form will be entered into a filing system and will only be accessed by authorised people of Solihull College and University Centre or its agents. The information will be retained by the College and will only be used for the purpose of (a) processing your Subject Access Request and audit purposes. By supplying such information, you consent to the College storing the information for the stated purposes. The information is held by the College in accordance with the provisions of the Data Protection Legislation.

### DATA SUBJECT DETAILS

<b>1: Please provide the following information to confirm your identity</b>	
Your full name	
Any previous surname by which you were or are known to the College and recorded in the College's records.	
Your date of birth	
Your current postal address	
Your current telephone and/or mobile number	
Your current e-mail address.	
Your staff or student matriculation/registration or National Insurance number	

### LOCATION

<b>3: To help us locate the relevant personal information, please specify in the following box (a) details of the relevant camera location, the date and time of the image/s that you wish to see as well as a general description of your appearance, clothing etc. at the time the image was recorded.</b>			
<b>DATE</b>	<b>TIME (APPROX.)</b>	<b>AREA</b>	<b>DESCRIPTION OF APPEARANCE</b>


**DECLARATION STATEMENT**

<b>4: To be completed by all applicants.</b>	
I certify that the information given in this form is true. I understand that it may be necessary for Solihull College and University Centre to confirm my/the Data Subject's identity. I also understand that it may be necessary for Solihull College and University Centre to obtain more detailed information to complete the request and that the 30-day period in which the College must respond to my request under the Data Protection Legislation only commences when reasonable inquiries to confirm my identity are completed. I hereby request the College to search for the records in the area identified above and inform me whether it holds any personal data (images), and to supply me with a copy of those images.	
<input type="checkbox"/> Tick this box to confirm	
Signed.....	Date:.....
Documents that must accompany this application:	
<ol style="list-style-type: none"> <li>1. Evidence of your Identity - you must supply evidence of your identity such as a photocopy of your College Student Card, College staff card, or the identity page of your passport or driving licence.</li> <li>2. All Subject Access Requests are free of charge; however, Solihull College and University Centre will charge a 'reasonable fee' if a request is manifestly unfounded or excessive, particularly if it is repetitive. The fee will be based on the administrative cost of providing the information.</li> </ol>	
When you have completed this form, please email it with the attached documents: <a href="mailto:quality@solihull.ac.uk">quality@solihull.ac.uk</a>	

**Subject Access Request - Office use only**

<b>Date request received</b>		
<b>Has the Identity been checked?</b>	YES	NO
<b>Type of documents used to establish ID e.g., student card, driver's licence.</b>		
<b>Date receipt and/or acknowledgement sent.</b>		
<b>Was any data withheld?</b>	YES	NO
<b>Reason for withholding data:</b>		
<b>Was any data withheld?</b>	YES	NO
<b>Format of personal data sent</b>	Email	Letter
<b>By Other (please specify)</b>		

<b>Notes and Actions</b>
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<b>Compliance date</b> Date of 30-day start _____	end _____
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**Date passed to data subjects:** \_\_\_\_\_

**Signed:** \_\_\_\_\_

**Print Name:** \_\_\_\_\_

**Position:** \_\_\_\_\_

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