



Closed Circuit TV (CCTV) Policy

LOCAL POLICY

Version 4.0

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Corporate Development

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Policy Compliance details:-

Compliance with Equality Legislation.

PLEASE NOTE: Policies must be equality screened before being submitted to SLT and Trade Unions:-

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2.0	Corporate Development	Adjustments following introduction of general data protection legislation and internal audit recommendations	January 2019
Blank	Blank	DPIA completed	May 2019
3.0	Estate & FM	Page 5, second paragraph under scope – change ‘at induction’ to ‘through the staff intranet, the website and through signage around the College’. Page 6 – At Titanic Quarter paragraph, change camera numbers from 4 to 9. Paragraph 5.4 – change Estate Area Managers to the Head of Estate and FM. Paragraph 5.4 – Additional paragraph at the end to address requests for CCTV images by the Harbour Police.	August 2020
Blank	Estate & FM	Paragraph 5.8 change ‘at induction’ to ‘through the staff intranet, the website and through signage around the College’.	June 2021
Blank	Corporate Development	Paragraph 5.4 change Corporate Compliance Officer to Data Protection and Complaints Officer. Modified to improve accessibility where possible to meet legal obligations.	June 2021
Blank	Estate & FM	Reviewed July 2022. No changes required	July 2022
4.0	Estate & FM	5.4 Corporate Development contact details updated 6.0 Corporate Development contact details updated Date Protection and Complaints Officer changed to Data Protection and Complaints Executive throughout	July 2024

Table setting out changes to documents by whom and when

Distribution

This document has been distributed as follows:

Name	Date (where applicable)
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Table setting out the distribution of the policy prior to approval and communication once approved

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1 Introduction and Purpose

This policy has been developed to comply with legal obligations and to provide guidance in the recording, processing and accessing of CCTV images across all Belfast Metropolitan College (Belfast Met) campuses. Belfast Met processes the personal data of living individuals such as its staff, students, contractors, research subjects and customers, including images captured by CCTV systems. This processing is regulated by the Data Protection Act 2018 (DPA), the General Data Protection Regulations and the Information Commissioner’s *CCTV Code of Practice*. The UK’s regulator for the DPA is the Information Commissioner’s Office.

It is the duty of Data Controllers such as Belfast Met to comply with the data protection principles with respect to personal data. This policy describes how Belfast Met will discharge its duties in order to ensure the continuing compliance of its CCTV systems with the DPA in general, the data protection principles and the CCTV Code of Practice and The Employment Practices Code in particular.

Belfast Metropolitan College uses CCTV cameras as part of its requirement to safeguard staff, students and visitors and to protect College property against criminal damage and for the detection of criminal activity. The College reserves the right to review and use footage from CCTV cameras for the purpose of investigations relating to students and/or staff misconduct.

The policy also takes cognisance of the Freedom of Information Act (FOIA) 2000 and the Human Rights Act 1998 (HRA).

The College does not use covert recording systems nor automated recognition technologies.

2. Definitions

Personal Data

“Personal data” means “Personal data” means any information relating to an identified or identifiable living individual. “Identifiable living individual” means a living individual who can be identified, directly or indirectly, in particular by reference to— (a) an identifier such as a name, an identification number, location data or an online identifier, or (b) one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of the individual.

Processing

Obtaining, recording or holding personal data. This includes organisation, adaptation or alteration; retrieval, consultation or use; disclosure; and alignment, combination, blocking, erasure or destruction.

Data Controller

As the organisation which determines the purposes of the processing, Belfast Met is the Data Controller for the personal data that it manages.

Data Subject

A living individual who is the subject of personal data.

Data Processor

Any third party (other than Belfast Met staff and students) who processes personal data on behalf of and on the instructions of the Data Controller.

3 Scope

This policy only applies to buildings where Belfast Met records images on CCTV and is therefore Data Controller. Belfast Met also delivers in buildings not owned by the College but where CCTV is in operation. Belfast Met is not the Data Controller in such circumstances however, appropriate Belfast Met staff may require access to this data in certain circumstances.

All staff, students, visitors and contractors should have a reasonable expectation of being captured on CCTV on a daily basis. Belfast Met will inform people they are in an area where a surveillance system is in operation. Prominent signs will be visible in areas where CCTV is in operation. Additionally, the use of CCTV for the purposes outlined in this policy will be communicated to staff and students through the staff intranet, the website and through signage around the College and through roll out of this policy.

Belfast Met 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 its premises. CCTV cameras and recording devices are deployed in order to:

- assist in the reduction, prevention and detection of crime
- assist with the identification, apprehension and prosecution of offenders
- monitor the security of buildings
- identify vehicle movement problems around the estate
- assist with safety and security management
- provide evidence which may be used by the police or others to prosecute offenders
- enhance public safety
- support protection of property
- Internal staff/student disciplinary proceedings

The Information Commissioner's CCTV Code of Practice (Employment Practices Code) also allows for employers to use images in circumstances which they cannot be reasonably expected to ignore (3.1.7), including criminal activity, gross misconduct or where behaviour is likely to put others at risk. In such circumstances the Code suggests that senior managers authorise the use of monitoring information.

Images of staff and students used in relation to investigations which lead to disciplinary proceedings will be made available to the subjects of the investigations or their representatives to provide them with an opportunity to respond. The college will take cognisance of the rights of others in this process-

4 Ownership of Images

As Data Controller, Belfast Metropolitan College owns all images captured on its CCTV surveillance system.

Titanic Quarter Campus – There are two CCTV systems operated in this campus. One is owned and operated by Ivywood Colleges Ltd through their facilities management provider, AMEY FM. A smaller number of CCTV cameras in this campus are owned and operated by Belfast Met. Ivywood Colleges Ltd is the Data Controller for the images it collects whilst Belfast Met is the Controller for the remaining 9 cameras. Images collected by Ivywood Colleges Ltd are rewritten after 30 days. Belfast Met images are rewritten after 30 days.

Millfield Campus – the CCTV system in this College is owned and operated by Northwin Ltd through their facilities management provider, Graham FM who are Data Controllers for this site. CCTV images are rewritten after 30 days.

Castlereagh – the CCTV system on this campus is owned and operated by Belfast Met. Images collected on this campus are rewritten after 30 days.

Springvale Campus

The CCTV systems on the Springvale campus is owned and operated by Belfast Met. Images collected on this campus are rewritten after 30 days.

Girdwood Hub

The CCTV system in Girdwood is owned and operated by Belfast City Council. CCTV images are rewritten in accordance with their CCTV policy.

Belfast Met will implement a data sharing framework regarding the sharing of all information between the College and third parties.

5 Operation

5.1 Siting of CCTV Cameras

Equipment used, image quality, camera siting and locations will be appropriate to ensure that the images are adequate for the purpose for which they are being collected. They will be situated so that they only capture

images relevant to that purpose, and to ensure they do not capture areas not intended to be the subject of surveillance. We will undertake a Data Protection Impact Assessment (DPIA) (**Appendix A**) on each site prior to the installation of CCTV cameras and sent to the Belfast Met Data Protection and Complaints Executive to ensure that we meet our obligations and respect individual's privacy. The checklist at **Appendix B** will also be completed and retained by the Estates Manager.

All recording devices will be located in a secure place to ensure freedom from interference. No alteration to the siting or positioning of any CCTV camera is permitted without the approval of the Estates & Facilities Management Area Manager responsible for the respective campus.

Sound recording is not permitted. The sound recording functionality will be disabled on systems which permit sound recording. Wireless cameras are not used.

To raise awareness of the use of CCTV on College premises, signs will be placed prominently to inform staff, students, contractors and visitors that they are entering an area where CCTV is in operation. All signs will stipulate the purpose of the CCTV surveillance and a contact number should any person want further information regarding the system. Signs will be in an appropriate size depending on the context e.g. for pedestrians or car drivers.

In buildings where Belfast Met is not the Controller, signs will provide the name of the Controller.

The CCTV system operates in all Belfast Met Campuses run 24 hrs a day 7 days a week.

5.2 Maintenance of CCTV equipment

All CCTV equipment will be maintained by the College or relevant Building owner, in line with the Planned Preventative Maintenance (PPM) and legislative schedules.

This regime of PPM will be audited by the College to ensure compliance with relevant legislation.

5.4 Access and Disclosure of Images

The Data Protection and Complaints Executive, nominated security staff and allocated security personnel will have access to CCTV images. Disclosure of information from the surveillance system must be controlled and all access will be recorded. In the event of an investigation into staff or student potential misconduct, CCTV images may be used. The following may also have access to the images:

- Head of Human Resources or nominee
- Head of Learner Success or nominee
- Head of Estate & FM or their nominee
- Investigating Officers in the event of an appropriate investigation
- Student or staff members involved in the investigation

The Data Protection and Complaints Executive must seek authority from a senior manager (for staff related images the Head of Human Resources or Head of Learner Success for student related images) to release imagery

to aid an internal investigation as recommended by the Information Commissioners' Office Employment Practices Code, whilst also keeping in mind other legal obligations under the data protection legislation.

Access to and disclosure of CCTV images recorded by other controllers on Belfast Met campuses e.g. Titanic Quarter and Millfield will be in accordance with respective contractual arrangements.

Access to CCTV images is restricted to those staff authorised to do so in accordance with this policy and in compliance with data protection requirements.

No person shall obtain, request copies or view recordings without the formal approval of the Data Protection and Complaints Executive. Breaches will be dealt with under the Colleges' Disciplinary Policy and Procedures.

If a request is made by the PSNI or Belfast Harbor Police, then they must submit a signed P81 Form, before any information is released to them".

5.4 Requests by Data Subjects

Data subjects have a right to access their personal data (including CCTV images of themselves). Subject Access Requests should be made using the Colleges' Subject Access Form (SAR) found on the Data Protection section of our [website](#).

Requests for information should be sent directly to:-

Data Protection and Complaints Executive
Belfast Metropolitan College
Integrated Shared Services Centre
398 Springfield Road
Belfast BT12 7DU

Telephone: 028 9026 5455

Email: dataprotection@belfastmet.ac.uk

Requests should include:

- Data and time the images were recorded;
- Information to identify the individual, if necessary; and,
- Location of the camera, if known.

CCTV recordings will be viewed in a closed area by the Data Protection and Complaints Executive with a member of staff who operates the system. No other individuals will be present. The Data Protection and Complaints Executive will then make a decision as to whether or not the information would be classified as personal data as defined by the Data Protection Act 2018 and the General Data Protection Regulations.

5.5 Approval of Requests

If the Data Protection and Complaints Executive approves the release of the information he/she will arrange for a copy of the images to be made through the Estates Manager or FM Manager at the Millfield, Titanic Quarter and Girdwood Campuses and ensure that no other individuals are identified within the footage released unless

they have provided their express permission for this release. For our retained estate the edit is completed by the Estates Manager.

A Data Sharing framework exists between Belfast Met and all relevant third parties to protect the integrity of the data in keeping with Data Protection Act 2018 and the General Data Protection Regulations. Another copy of the footage will be made and forwarded to the Data Protection and Complaints Executive for secure filing. This will be disposed of securely as set out in the Colleges' Retention and Disposal Schedule.

The SAR will be retained by the Data Protection and Complaints Executive in the same manner as all other SARs are retained.

5.6 Refusal of Requests

If the Data Protection and Complaints Executive decides that a Subject Access Request will not be complied with, the following information will be documented and retained:

- The identity of the individual making the request;
- The date of the request;
- The reason for refusing to supply the images requested; and
- The name and signature of the manager making the decision

The Data Protection and Complaints Executive will advise the Data Subject of the reason for the refusal within the stipulated 30 calendar day period.

Should the College receive a request from a law enforcement agency, the Data Protection and Complaints Executive may review and release the CCTV images where the content may assist with detection / prevention of a crime / act of terrorism.

The following information should be documented:

- The date and time at which access was allowed or the date on which the disclosure was made;
- The identification of any third party who was allowed access or to whom disclosure was made;
- The reason for allowing access or disclosure;
- The extent of the information to which access was allowed or which was disclosed;
- Any crime incident number to which the images may be relevant (relevant only to release of images to a law enforcement agency); and,
- The signature of the collecting law enforcement officer (relevant only to release of images to a law enforcement agency).

5.7 Awareness

Belfast Met will ensure that staff and students are advised that imagery collected through CCTV may be used as part of an internal investigation. This purpose will also be included on our signage and communicated to staff and students through the staff intranet, the website and through signage around the College and through roll out of the policy.

5.8 Retention and Disposal

Where Belfast Met is the Data Controller, recordings will be overwritten after 30 days' coverage as stated in the Colleges' Retention and Disposal Schedule unless recording copies are needed for evidential purposes in legal proceedings. In such circumstances the section of the recording will be copied and retained as set out in Section 4.3 above.

6 Compliance

All enquiries or complaints regarding the CCTV systems should be directed to:-

Data Protection and Complaints Executive
Belfast Metropolitan College
Integrated Shared Services Centre
398 Springfield Road
Belfast BT12 7DU

Telephone: 028 9026 5455

Email: dataprotection@belfastmet.ac.uk

7. Disciplinary Proceedings

Belfast Met may use CCTV images in the course of an internal investigation. Access to images obtained by other CCTV cameras on the named sites in Section 4 above may also be sought. At all times the College will comply with this policy and the data protection legislation.

Anyone accessing CCTV images without the authority of the Data Protection and Complaints Executive, or anyone found in breach of this Policy may be subject to the Colleges' Disciplinary Procedures.

8. Review of Systems

The policy will be reviewed annually by the Estate Compliance Officer to ensure adherence to this policy using the template set out at **Appendix C**.

A report of this review will be forwarded to the Colleges' Data Protection and Complaints Executive. An annual review will evaluate the effectiveness of the system. These reports can be made available upon request.

Appendix A

Data Protection Impact Assessment Template

Accessible versions of this form are available upon request from Corporate Development

Step one: Identify the need for a PIA	Explain what the project aims to achieve, what the benefits will be to the College, to individuals and to other parties. You may find it helpful to link to other relevant documents related to the project, for example a project proposal.		
<i>Type here</i>			
Step two: Describe the information flows	You should describe the collection, use and deletion of personal data here and it may also be useful to refer to a flow diagram or another way of explaining data flows. You should also say how many individuals are likely to be affected by the project.		
<i>Type here</i>			
Consultation requirements	Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted internally and externally? How will you carry out the consultation? You should link this to the relevant stages of your project management process.		
<i>Type here</i>			
Step three: Identify the privacy and related risks	Identify the key privacy risks and the associated compliance and corporate risks. Larger-scale PIAs might record this information on the divisional or corporate risk register. <i>(Add rows as necessary)</i>		
Privacy issue	Risk to individuals	Compliance risk	Associated organisation / corporate risk
Step four: Sign off and record the PIA outcomes	Who has approved the privacy risks involved in the project? What solutions need to be implemented? <i>(Add rows as necessary)</i>		
Risk	Approved Solution		Approved by
Step five:	Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for		

Integrate the PIA outcomes back into the project plan	implementing the solutions that have been approved? Who is the contact for any privacy concerns that may arise in the future? <i>(Add rows as necessary)</i>	
Action to be taken	Date for completion of actions	Responsibility for action

Contact point for future privacy concerns

Linking the PIA to the Data Protection Principles

Also answer these questions to help you identify where there is a risk that the project will fail to comply with the DPA or other relevant legislation, for example the Human Rights Act.

Principle 1

Personal data shall be processed lawfully, fairly and in a transparent manner in relation to the data subject

Question	Answer
Have you identified the purpose of the project?	
How will you tell individuals about the use of their personal data?	
Do you need to amend your privacy notices?	
Have you established which lawful basis for processing apply?	
If you are relying on consent to process personal data, how will this be collected and what will you do if it is withheld or withdrawn?	

As the College is subject to the Human Rights Act, you also need to consider:

Question	Answer
Will your actions interfere with the right to privacy under Article 8?	
Have you identified the social need and aims of the project?	

Are your actions a proportionate response to the social need?	
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Principle 2

Personal data shall be collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall, in accordance with [Article 89\(1\)](#), not be considered to be incompatible with the initial purposes.

Question	Answer
Does your project plan cover all of the purposes for processing personal data?	
Have you identified potential new purposes as the scope of the project expands?	

Principle 3

Personal data shall be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed

Question	Answer
Is the quality of the information good enough for the purposes it is used?	
Which personal data could you not use, without compromising the needs of the project?	

Principle 4

Personal data shall accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay.

Question	Answer
If you are procuring new software does it allow you to amend data when necessary?	
How are you ensuring that personal data obtained from individuals or other organisations is accurate?	

Principle 5

Personal data shall be kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.

Question	Answer
What retention periods are suitable for the personal data you will be processing?	

Are you procuring software that will allow you to delete information in line with your retention periods?	
---	--

Principle 6

Personal data shall be processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

Question	Answer
Do any new systems provide protection against the security risks you have identified?	
What training and instructions are necessary to ensure that staff know how to operate a new system securely?	

Please authorise – this must be completed by the Information Asset Owner(s)

Name	Business Area	Date

Appendix B

Belfast Metropolitan College (Belfast Met) Checklist for CCTV systems monitoring college sites

This CCTV system at (Name Site) and the images produced by cameras on this site, are controlled by who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 2018).

We (Belfast Met) has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It may also be used for internal staff/student investigations but not for normal staff/student monitoring. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

(Accessible versions of this form are available upon request from Corporate Development)

	Date	By	Review Date	Comments/Issues
Notification has been submitted to the Information Commissioner and is contained within the controller registration.	Renewed every May	Corporate Development		
A copy of the notification to be retained by Estates and a copy provided to the Data Protection and Complaints Executive				
There is a named individual who is responsible for the operation of the system.				
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.				
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.				
Cameras have been sited so that they provide clear images.				
Cameras have been positioned to avoid capturing the images of persons not visiting the premises				
There are visible signs showing CCTV is in operation. Where it is not obvious who is responsible for the				

	Date	By	Review Date	Comments/Issues
system contact, details are displayed on the sign(s).				
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.				
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.				
Except for law enforcement bodies, images will not be provided to third parties.				
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.				
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.				
Regular checks are carried out to ensure that the system is working properly and produces high quality images.				

(Accessible versions of this form can be requested from Estates and Facilities Management)

	CCTV System Audit Report			Month:	
Compliance standard:	Date Protection Act 2018 and General Data Protection Regulations (GDPR)				Audit date:
	Asset Register	Y/N/NA	Comments/Non conformance	Action	By whom and completion date
1.0	Is there an asset register (including fixed position cameras, pan tilt and zoom cameras, monitors, digital recorders/servers etc) for all CCTV systems operated/maintained by Belfast Met on this campus available?				
	Policy				
2.0	Does Belfast have a CCTV Policy for this campus?				
3.0	Arrangements/Procedures				
	Can Belfast Met prove:				
3.1	All users of the site are notified of the use of CCTV by appropriate signage at strategic points throughout the college e.g. entrances/exits and in lifts if applicable.				
3.2	All CCTV cameras cannot focus on neighbouring houses and gardens. This will apply no matter which camera function is employed.				
3.3	The images that are recorded will be held in a secure location on the system's server and can only be accessed by those authorised to do so.				

3.4	The secure location for viewing live images will be in a restricted area – not a public area. (Remote access is allowed to the System Manager.)				
3.5	Belfast Met CCTV operator and Estate Manager are able to view the live image display and are able to review/access recorded images.				
3.6	The images will be digitally recorded on a rolling programme for a set period. Unless required for evidence purposes, this retention method will automatically overwrite the oldest images.				
3.7	Any retention of images kept on the server, other than those recorded on a rolling programme, will be kept until they are no longer required then overwritten in the normal way.				
3.8	When a recording device is being replaced/disposed that all images will be erased prior to replacement/disposal and CCTV Log updated.				
3.9	Any downloaded image can only be made available following a written request to the Data Protection and Complaints Executive.				
	Maintenance/Inspection Programme/Operation				
4.0	How often is the CCTV system serviced/maintained?				
4.1	How often is the CCTV system visually inspected to check integrity of operation?				
4.2	Is the date and time correct (and watermark present - if used)?				
4.3	Are all cameras operational?				
	Substantial repairs or modifications				

5.1	Have there been any substantial repairs, modifications or change to the CCTV system operated by Belfast Met on this campus?				
5.2	☐ Name of contractors/staff used				
5.3	☐ List competency				
	☐				
	Record keeping				
6.0	Is there a biannual service/maintenance certificate/report available?				
6.1	Are any faults/defects listed on any of the above report(s)?				
6.2	Have any remedial actions taken been recorded?				
6.3	Have all remedial actions taken been completed in a reasonable time and in accordance with the time frame stated in the SLA?				
	Competency of Service Contractors/staff used				
7.0	Contractor's business name				
7.1	Competency				
7.2	To what standards are CCTV systems serviced/maintained?				
	Note				
	Audit Summary				
	Estate Compliance Officer				
	Review date:				