1 Scope of this Policy

1.1 This Policy outlines the College’s approach to the use and management of CCTV systems across the institution, to ensure a safe and secure environment for staff, students and visitors, and to protect College property.

1.2 This Policy has been produced in line with the Information Commissioner’s 2014 CCTV Code of Practice and is designed to ensure the College complies with its obligations under the Data Protection Act 1998 (DPA) and other relevant legislation.

2 Usage

2.1 The CCTV system is used solely for the purpose of security surveillance in accordance with the following objectives:

2.1.1 To create a safer working environment for staff and students in the College by monitoring the security of College buildings;

2.1.2 To protect property belonging to the College, students and staff;

2.1.3 To assist in the prevention and detection of crime; and

2.1.4 When necessary, to provide evidence for any inquiry or prosecution that is associated with criminal activity committed on College property, or the misuse of College rooms, facilities or equipment.

3 Operation and Management

3.1 Operation of the central CCTV system is restricted to members of the Porters’ team or other persons authorised and directed by the Senior Bursar or Domestic Bursar. The IT department is responsible for the maintenance of the IT infrastructure of the College, including the servers and PCs where CCTV footage is recorded.

3.2 Library staff and the Head Boatman may monitor the footage of the cameras located in the library and boathouse, respectively. Library staff can use the photographs and footage taken by the library CCTV cameras to identify incorrect usage of library equipment. Neither team and/or individual can interrogate the system without appropriate authorisation in accordance with this policy.
3.3 The persons authorised to operate/monitor the CCTV footage under 3.1 and 3.2 above are referred to elsewhere in this policy as “Authorised Persons”. They will be appropriately trained and made aware of the requirements of this policy.

3.4 Recorded material will be securely and carefully stored, and interrogation of recorded images will only be conducted by fully trained and authorised operatives, as set out in section 7 below.

3.5 In cases of disaster recovery, alternative arrangements will be put in place by the College’s Emergency Response Team, taking appropriate account of the code of practice and legislation referred to at 1.2 above.

4 Privacy and compliance

4.1 The College is committed to providing and operating a system that is consistent with an individual's rights under the DPA and any other relevant legislation.

4.2 In order to protect the privacy and other rights of students, staff and visitors, the College will regularly evaluate the system to ensure that it meets the objectives set out above. This will be carried out through proactive checks or audits on the correct usage of the CCTV system by the Senior Bursar or Domestic Bursar or by a third party authorised by the College (and provided that appropriate measures are in place to ensure that such third party complies with this policy and the relevant legislation). These checks will also assess the necessity and proportionality of the CCTV system. The outcome of these audits will be recorded.

4.3 To protect the privacy of the College’s neighbours, pixelation will be used to obscure any images of neighbouring private property unavoidably caught on College CCTV. In addition, no staff are authorised to manoeuvre the ‘Point, Tilt and Zoom’ (PTZ) cameras from their normal position unless directed to by either the Head Porter, and appropriate privacy measures have been put in place.

5 Cameras

5.1 A number of cameras are located at fixed positions within the College grounds and relay images of College property, as listed in Appendix 1. Where the positioning of cameras unavoidably covers parts of neighbouring private property or the public highway, appropriate digital masking (pixelation) is used to restrict footage from such areas. The College does not have a license to carry out surveillance of a public space under the Private Security Industry Act 2001. The College does not engage third party
contractors to monitor CCTV footage of public areas, but would need to take account of the licensing arrangements under the Private Security Industry Act 2001 if it considers engaging such contractors in future.

5.2 The footage can be viewed by Authorised Persons on a “real time” basis, as well as recorded for archive purposes and for replay in the event of an incident.

5.3 The cameras record all activity within their range as a matter of course. The Cameras run for 24 hours a day, 7 days a week, and are all strategically positioned in their locations to ensure that maximum coverage is given to high risk areas with the minimum number of cameras.

5.4 The Library CCTV system captures a photograph every time the automatic check-in machine or the gate scanners are activated. An e-mail with the photograph is generated informing the library staff of the incident.

5.5 Appropriate signage (see pages 36-38 of the ICO Code of Practice) is on display informing staff, students, visitors and members of the public that CCTV is in operation.

5.6 The detailed locations and scope of the College cameras are provided at Appendix 1.

6 **Changes and additions of cameras and viewing angles**

6.1 A privacy impact assessment will be completed prior to any changes and/or additions in viewing angles and/or scope of any cameras.

6.2 Consultations and/or risk assessments will be conducted where appropriate to ensure compliance with this policy when changes are being considered to the location or viewing angles of CCTV cameras.

6.3 A Security review will conducted by the Head Porter yearly and reviewed by the Domestic Bursar.

6.4 All changes will be authorised in writing by the Senior Bursar or Domestic Bursar and the Camera Register (Appendix 1) will be updated accordingly.

7 **Restrictions**

7.1 Operation of the central CCTV system is restricted to members of the Porter’s Lodge only or other College staff authorised and directed by the Senior Bursar or the Domestic Bursar. Interrogation of recorded images will only be conducted by fully
trained employees of the College authorised and directed by the Senior Bursar or the Domestic Bursar, in a designated secure and restricted area.

7.2 Library staff and the Head Boatman may monitor the footage of the cameras located in the library and boathouse, respectively.

7.3 On no account will CCTV recordings be viewed by any unauthorised person, or removed from the Porters’ Lodge, Library or Boathouse without specific approval of the Senior Bursar, the Domestic Bursar or the Head Porter.

Staff are informed that misuse or unauthorised use of the CCTV system will be considered as a serious disciplinary matter, and deliberate or reckless misuse of surveillance system information can also be a criminal offence.

7.4 The CCTV system will not record audio.

8 Storage, retention and copy requests

8.1 Storage

8.1.1 Images recorded by the College at the main campus and at Owlstone Croft are stored directly onto the College server. Camera footage at the Boathouse is recorded onto a local hard drive. The College is working towards linking the Boathouse to the central College server. Access to the images and digital files is password restricted to the relevant Authorised Persons.

8.2 Retention

8.2.1 Unless required for evidential purposes or investigation by the College or as required by law, recorded images will be held for a period of 35 days before they are recorded over. This is a continual rolling process ensuring that recorded images are securely and permanently deleted and that no images are held, as a matter of course, for any longer than they are needed.

8.2.2 Systematic checks will be carried out by the Senior Bursar or Domestic Bursar or by a third party authorised by the College to ensure that the retention policy is adhered to. The outcome of these audits will be recorded.

8.3 Requests for copies of images under the DPA & freedom of information legislation
8.3.1 The Data Protection Act 1998 gives individuals the right to access personal information about themselves, which may include CCTV images.

8.3.2 The Freedom of Information Act 2000 and the Environmental Information Regulations 2004 ("FOI legislation") allow other entities and individuals to make requests for information, which may also include information contained in CCTV images. Any request must be considered taking account of various exemptions under the legislation and including matters such as the rights of any individuals shown in the images under the DPA.

8.3.3 Staff are reminded that once a request has been received under the DPA or FOI legislation, it is a criminal offence (and potentially also a disciplinary matter) to alter, deface, block, erase, destroy or conceal any record held by the College, with the intention of preventing the disclosure of all, or any part, of the information.

8.3.4 Applications for images made by individuals whose information is recorded must be made in accordance with the College’s Data Protection Policy (available on the College website) and supported by specific information, including date, time and location where the footage was captured, as well as proof of identity. The length of the retention period may be extended with the consent of the Senior and/or Domestic Bursars to facilitate processing such applications.

8.3.5 Applications made under FOI legislation will be dealt with in accordance with the requirements and timescales identified within the legislation.

8.3.6 Requests by external organisations or individuals requesting copies obtained by the Queens’ College CCTV system must be made in writing (DPO@queens.cam.ac.uk or Domestic Bursar, Queens’ College, Cambridge, CB3 9ET), supported by specific information including date, time and location where the footage was captured, a reason for the request and will be considered in accordance with the College’s obligations under the DPA and other relevant legal obligations. Decisions should be made with reference to the Information Commissioner’s Data Sharing Code of Practice.

8.3.7 For internal use in accordance with the objectives of this policy, copies of the images will not be provided without the express permission of either the
Senior Bursar or Domestic Bursar and Head Porter. In exceptional, emergency circumstances, permission can be granted by only one of the above.

8.3.8 The Senior Bursar will maintain a record of any information/images from the CCTV system provided to individuals or organisations pursuant to requests made under the DPA or FOI legislation. The record will include:

(i) The nature of the information provided;
(ii) The date it was provided;
(iii) The name (and if appropriate, organisation) of the person it was provided to;
(iv) The reason why they required the information.

8.4 Requests from the Police

8.4.1 Access to the CCTV by the Police can only be authorised by the Senior Bursar, Domestic Bursar or College Data Protection Lead (CPLD).

8.4.2 Requests from the Police may occur in a number of forms:

(i) Requests for a review of images in order to trace incidents that have been reported to the Police;
(ii) Immediate action relating to live incidents e.g. immediate pursuit;
(iii) Major incidents that occur, when images may have been recorded continuously; and/or
(iv) An individual Police Officer seeking to review recorded images within the Porters’ Lodge.

8.4.3 As a data controller, the College needs to ensure that it protects the personal data which it holds about people. Equally, the College appreciates that the police need to investigate matters which are drawn to its attention.

8.4.4 Under the Data Protection Act 2018, there is a provision which would permit the College to disclose personal data to you for the purpose of either the prevention or detection of crime or the apprehension of offenders. However,
the provision in the legislation also requires us to be satisfied that the application of our data protection obligations would be likely to prejudice either of these purposes.

8.4.5 The Police must confirm that they require disclosure of CCTV images for one of these purposes, and also confirm the prejudice to the investigation if disclosure is not made.

8.4.6 The Police request is usually made in writing (DPO@queens.cam.ac.uk or Domestic Bursar, Queens’ College, Cambridge, CB3 9ET), expressly confirming the necessity of the disclosure of the information requested for your investigation. This will be reviewed by the CDPL.

9 Training

9.1 General training on use of the CCTV system is provided by the system’s maintenance provider. This training is given to the Porters as part of the College’s internal training programmes. Further, detailed familiarisation training is provided for certain nominated users (Bursars, Computer staff and Head Porter).

9.2 Appropriate training to enable the Head Porter to fully interrogate the system, produce copies of images from it and be legally compliant, is provided.

10 Policy Review

10.1 This policy will be reviewed at least every 3 years or when there are changes to any legal framework governing the use of equipment.

11 Complaints

Any complaints regarding the operation of the CCTV system or a failure to comply with the Information Commissioner’s CCTV code must be made in writing to: DPO@queens.cam.ac.uk or Domestic Bursar, Queens’ College, Cambridge, CB3 9ET.
Appendix 1 - Camera Register: specifications and locations of cameras.

<table>
<thead>
<tr>
<th>Camera Number</th>
<th>Location</th>
<th>View</th>
<th>Type</th>
<th>Pixel mask</th>
</tr>
</thead>
<tbody>
<tr>
<td>1</td>
<td>Porter's Lodge Foyer</td>
<td>Porter’s Lodge Foyer, reception desk and footpath outside the Lodge.</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>2</td>
<td>Porters Back Door</td>
<td>Walkway covering junction of Fisher, Round and Porters Lodge back door. The Round, Wooden Bridge, Essex Building.</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>3</td>
<td>Fisher Gate</td>
<td>Pavement and road outside Fisher Gate as far as rising bollards</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>4</td>
<td>Fisher Building (South facing)</td>
<td>Pavement and road outside Fisher Gate</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>5</td>
<td>Old Court Gate</td>
<td>Internal view of Old Court Gate and Shop entrance</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>6</td>
<td>Dokett Gate</td>
<td>Internal view of Dokett Gate</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>7</td>
<td>Owlstone Croft, Gatehouse</td>
<td>Internal grounds and rear of Owlstone Road</td>
<td>Static</td>
<td>Yes</td>
</tr>
<tr>
<td>8</td>
<td>Owlstone Croft, Gatehouse</td>
<td>Internal entrance hall</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>9</td>
<td>Owlstone Croft entrance hall</td>
<td>Internal entrance hall and door</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>10</td>
<td>Owlstone Croft, B Block (South wall)</td>
<td>Internal grounds and rear of Owlstone Road</td>
<td>PTZ</td>
<td>Yes</td>
</tr>
<tr>
<td>11</td>
<td>Boathouse. North east corner (2)</td>
<td>Covering Trafalgar Road, Trafalgar Street gardens and public right of way</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>12</td>
<td>Boathouse. South east corner</td>
<td>Covering the launch area, River Cam and Midsummer Common</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>13</td>
<td>Boathouse. South west corner</td>
<td>Covering the launch area, River Cam and Lady Margaret and St John’s Boathouses</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>14</td>
<td>Boathouse. North west corner (2)</td>
<td>Covering thoroughfare to “Winter Comfort”, Lady Margaret and St John’s Boathouses private gardens in Trafalgar Street</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>Location</td>
<td>Description</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>---</td>
<td>----------------</td>
<td>-----------------------------------------------------------------------------</td>
<td>--------</td>
<td>----</td>
</tr>
<tr>
<td>15</td>
<td>Boathouse</td>
<td>Stairs to accommodation</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>16</td>
<td>Boathouse</td>
<td>Stairs to accommodation</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>17</td>
<td>Boathouse</td>
<td>Private access route at rear</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>18</td>
<td>Boathouse</td>
<td>Private access route at rear</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>19</td>
<td>Library</td>
<td>Entrance to Library – Library help desk</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>20</td>
<td>Library</td>
<td>Entrance to Library – Library help desk</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>21</td>
<td>Dokett Gate</td>
<td>External view of Dokett Gate; pavement and road view</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>22</td>
<td>Underground Car Park</td>
<td>Wide angle coverage of underground car park</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>23</td>
<td>Underground Car Park</td>
<td>Entrance to the Car Park and NE quarter of car park</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>24</td>
<td>Nursery Garden</td>
<td>Nursery Playground</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>25</td>
<td>Owlstone Croft B Block</td>
<td>Above B Block Entrance – Car Park</td>
<td>Static</td>
<td>No</td>
</tr>
<tr>
<td>26</td>
<td>Owlstone Croft Rear</td>
<td>Bicycle sheds and grounds</td>
<td>Static</td>
<td>No</td>
</tr>
</tbody>
</table>
| 27| Sportsground (4) | 1. Outside bungalow front door looking across the private driveway  
2. On the gable end of the pavilion looking towards the main entrance  
3. Outside Head Groundsman’s office door looking towards the field  
4. On the tractor shed looking between the two sheds | Static | No |
| 28| Loading Bay (NEW) | Covers loading bay entrance/offloading area and rear of kitchen          | Static | No |