



University of  
**Salford**  
MANCHESTER

# **Security CCTV Policy**

**Version Number 2.3**

**Effective from 21/06/2018**

**Author: Head of Security**

**Estates & Professional Services**

| <b>Document Control Information</b>   |  |                |  |
|---|--|----------------|--|
| <b>Revision History incl. Authorisation: (most recent first)</b>                      |  |                |  |
| <b>Author</b>   | <b>Summary of changes</b>  | <b>Version</b> | <b>Authorised &amp; Date</b>           |
| T. Jones  | Updates to include GDPR 2018   | V2.3           | Deputy Director Estates<br>21/06/2018  |
| T. Jones  | Inclusion of arrangements around use of BWV, Complaints Procedures and Released Information to third parties   | V2.2           | Associate Director E&PS:<br>29/11/2017 |
| T. Jones & M. Stephenson  | Updated name and minor wording change to make it clear that this policy refers to the CCTV managed by Security   | V2.1           | Associate Director E&PS:<br>09/07/2015 |
| T. Jones & M. Stephenson  | Updated, more comprehensive version  | V2.0           |  |
| T. Jones & M. Stephenson  | New document   | V1.0           |  |
| <b>Policy Management and Responsibilities:</b>  |  |                |  |
| Owner:  | This policy is issued by the University Secretary and the Director of Estates & Facilities. The University Secretary has responsibility to ensure compliance with all legislative and regulatory standards. The Director of Estates & Facilities has 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. |                |  |
| Others with responsibilities (please specify):  | All subjects of the Policy will be responsible for engaging with and adhering to this policy.  |                |  |
| <b>Author to complete formal assessment with the following advisory teams:</b>        |  |                |  |
| Equality Analysis (E&D, HR)<br><a href="#">Equality Assessment form</a>               | 1. <i>Nov 2017</i>   |                |  |
| Legal implications (LPG)  | 2. <i>N/A</i>  |                |  |
| Information Governance (LPG)  | 3. <i>During review with Head Information Governance June 2017</i>   |                |  |
| Student facing procedures (QEO)   | 4. <i>N/A</i>  |                |  |
| UKVI Compliance (Student Admin)   | 5. <i>N/A</i>  |                |  |
| <b>Consultation:</b>  |  |                |  |
| Staff Trades Unions via HR<br>Students via USSU<br>Relevant external bodies (specify) | N/A  |                |  |
| <b>Review:</b>  |  |                |  |
| Review due:   | 3 years by November 2021   |                |  |
| Document location:  | <a href="http://www.salford.ac.uk/policies">University of Salford Policy pages</a><br><a href="http://www.salford.ac.uk/policies">http://www.salford.ac.uk/policies</a>  |                |  |

|                                     |
|-------------------------------------|
| <b>Document Control Information</b> |
|-------------------------------------|

|   |
|---|
| <b>The owner and author are responsible for publicising this policy document.</b> |
|---|

## 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 University and public alike have free access.
- 1.2 The purpose of this policy is to outline the University's approach to the use of CCTV systems for security purposes across the institution and to comply with the requirements of GDPR2018 , 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 University'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 in order 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 University 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 University shall be responsible for all CCTV operated upon its estate and shall be the Data Controller for the requirements of GDPR 2108 ensuring that all obligations are met.
- 3.2 Estates and Property Services is responsible for the operation and management of the University's Security CCTV systems.
- 3.3 The University shall ensure that its notification to the GDPR 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 University shall not undertake covert surveillance without express authorisation from the Vice Chancellor or their appointee and approval of the Head of Security 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 University 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.

### **Monitoring and Sanctions**

- 3.10 Adherence to this policy, controls around, and the usage of, CCTV shall be reviewed annually by the Head of Security and the Data Protection Officer.
- 3.11 Reports of breaches shall be investigated thoroughly and in accordance with the appropriate legislation.
- 3.12 As an Officer of the University, the Director of Estates and Property Services or his nominee has the authority to investigate alleged breaches of this policy and where necessary may refer individuals to their School or Division for disciplinary action.
- 3.13 The only exceptions to paragraphs 3.1- 3.12 shall be where this is otherwise stipulated and governed by separate agreements (such as in the case of the Security CCTV systems at the Media City UK Campus).

### **4.0 Related Documentation**

The below documents can be found on the University policy and procedures pages:

Information Commissioners Office CCTV Code of Practice

### **5.0 Complaints**

Any complaints about the use of CCTV at the University should be directed to the Students complaints procedure or the University complaints procedures as laid out in the Policies and Procedures section on the intranet.

### **6.0 Released Information to Third Parties**

All information that is released to third party persons is the subject of GDPR. Information to statutory prosecuting authorities will require DPA legislative forms and those appertaining to Greater Manchester Police are subject to the Information Sharing Agreement. Other Policies such as the GDPR Policy, Freedom of Information Policy, Information Security Policy, Information and Records Policy and Complaints/Grievance Procedures can be found on the University Intranet

## **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

These arrangements have been written by the University's Data Protection Officer and agreed by the University Secretary and Executive Director for Estates and Facilities.

### **Purposes of BWV**

BWV are used at the University of Salford to enable the recording of incidents where video footage will be beneficial to:

- increase reassurance of members of the University community;
- reduce crime and disorder and the fear of crime and disorder;
- reduce antisocial behaviour;
- ensure that the University 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 University of Salford security staff: any change to this arrangement must be agreed by the Vice Chancellor or another member of the Executive Team.
- All BWV shall be managed by the University of Salford security team. The Head of Security 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 Head of Security, Deputy Head of Security or Security Operations Manager.
- All incidents which involve the use of body one cameras 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.

- Before recording commences officers wearing BWV should alert those present that the recording will be taking place stating the following:
  - that recording is taking place;
  - that this includes audio recording;
  - their own name and that of any colleagues;
  - the date;
  - the time;
  - the location; and
  - the nature of the incident.

If the recording has started prior to the arrival of the officer at the scene, they should state this upon arrival.

Where this is not operationally possible, this information should be provided as soon as it is practicable to do so.

- The cameras shall be aimed at those involved in the incident and not at third parties who are not involved. Officers should do their best to ensure that those not involved in an incident are not recorded: this may include standing in a position to block them from being filmed or asking them to move.
- BWVs should be permitted to continue for approximately 15 minutes after any incident has concluded the officer wearing the BWV should state the date, and time.
- 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 purposes of an investigation.
- Every six months, use of BWV shall be reviewed and the BWV footage management system will be audited.

---

I confirm that I have been trained in the use of Body Worn Video Cameras and have received, read and understood a copy of these arrangements for its use:

Name: .....

Position: .....

Date: .....