



TRINITY HALL
CAMBRIDGE

CCTV Policy

Contents	Page
1. Introduction	2
2. CCTV system overview	2
3. Purpose of CCTV system	3
4. Monitoring & Recording	4
5. Compliance with Data Protection Legislation	5
6. Applications for disclosure of images	6
7. Retention of images	7
8. Complaints procedure	7
9. Governance	8

1. Introduction

- 1.1. Trinity Hall (the “College”) has in place and is further developing a CCTV surveillance system, "the system" on the College site. The College site comprises for this purpose all Trinity Hall properties located within the City of Cambridge with the exception of residential properties in Bateman Street. Images can be monitored and are recorded centrally and will be used in strict accordance with this policy.
- 1.2. This policy details the purpose, use and management of the CCTV system at the College and details the procedures to be followed in order to ensure that the College complies with relevant legislation and the current Information Commissioner’s Office CCTV Code of Practice.
- 1.3. The College will have due regard to the Data Protection Act of 2018¹, the General Data Protection Regulation (GDPR)² and any subsequent data protection legislation, and to the Freedom of Information Act 2000³, the Protection of Freedoms Act 2012⁴ and the Human Rights Act 1998⁵. Although not a relevant authority, the College will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.
- 1.4. This policy is based upon guidance issued by the Information Commissioner’s Office⁶.

2. CCTV system overview

- 2.1. The system is owned by Trinity Hall, Trinity Lane, Cambridge, CB2 1TJ. The College is registered with the Information Commissioner’s Office as the Data Controller for personal data processed by the College including audio and visual data from its CCTV system. The CCTV system operates to meeting requirements of the Data Protection Act and Information Commissioner’s guidance.
- 2.2. The Junior Bursar is responsible for the overall management and operation of the system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.

¹<https://www.gov.uk/data-protection>

² <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/>

³ <https://ico.org.uk/about-the-ico/what-we-do/legislation-we-cover/freedom-of-information-act/>

⁴ <https://www.legislation.gov.uk/ukpga/2012/9/contents>

⁵ <https://www.legislation.gov.uk/ukpga/1998/42/contents>

⁶ <https://ico.org.uk/for-organisations/guide-to-data-protection/key-dp-themes/guidance-on-video-surveillance-including-cctv/>

- 2.3. The CCTV system operates across the College's administrative and residential sites.
- 2.4. Signs are placed at all entrances in order to inform Fellows, staff, students, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by the College and a 24 hour contact number is provided.
- 2.5. The Junior Bursar is responsible for ensuring that adequate signage is erected in compliance with ICO CCTV Code of Practice.
- 2.6. Cameras are sited to ensure that they cover College premises as far as possible. Cameras are not sited to focus on private residential areas and cameras situated in College residential areas focus on entrances and communal areas. Wherever practicable, the CCTV cameras are prevented from focusing or dwelling on domestic accommodation. CCTV cameras are predominantly positioned facing outwards towards external entrances to College sites except for two locations:
 - The Pavilion, to ensure anyone training alone is monitored for safety.
 - The entrance to the library to record the security of the College's books.
 - Pigeon Holes in Porters' Lodges to secure post.
 - Silver Safe
 - Wychfield Computer Room
 - Avery CourtAny cameras facing into public areas are sited so that the minimum amount of collateral intrusion is caused in order to achieve the stated purposes.
- 2.7. The CCTV system is operational and is capable of being monitored for 24 hours a day throughout the whole year.
- 2.8. The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV Camera installation is subject to a privacy assessment.

3. Purpose of the CCTV System

- 3.1. The system has been installed by Trinity Hall with the purpose of reducing the threat of crime generally, protecting Trinity Hall's premises and helping to ensure the safety of all Trinity Hall's Fellows, staff, students and visitors consistent with respect for the individuals privacy. These purposes will be achieved by monitoring the system to:
 - Deter those having criminal intent.
 - Assist in the prevention and detection of crime.
 - Facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order.

- Facilitate the identification of any activities/event which might warrant disciplinary proceedings being taken against Fellows, staff or students and assist in providing evidence to managers and/or to a member of the Fellowship, staff or student against whom disciplinary or other action is or is threatened to be taken.
 - The system will also be used for the purpose of health and safety, particularly in the gym, to ensure individuals using this facility on their own are being monitored in case they become injured and need support.⁷
 - The system will not be used to provide live streaming images for public access or for any marketing purposes.
- 3.2. The College seeks to operate its CCTV system in a manner that is consistent with respect for the privacy of individuals.

4. Monitoring and Recording

- 4.1. Cameras are monitored in the Porters' Lodges and real time monitoring facilities are also available in the offices of the Junior Bursar, Head Porter and Deputy Head Porter. The IT also have access for the purpose of administration of the system.
- 4.2. An emergency audio function is designed into the installation in the Central Site Porters' Lodge and could be replicated at Wychfield. If enabled, an emergency button could be pushed at the discretion of the porter on duty in the event they feel threatened or consider a current situation requires audio capture as well as visual images.
- 4.3. Images are recorded on equipment located securely within the College buildings. The Head Porter and Deputy Head Porter will have monitoring equipment which will allow them to monitor live images from the cameras but will also have the facility to search and view stored images. Transfer of images onto other media will only take place in line with the purposes of the system outlined above and will only be carried out by the system manager. Should it be necessary to create a copy of any data onto other media, a College incident report will be created by the system manager detailing:
- the reasons why the copy was made;
 - the date and time stamps of the recording;
 - the format of the copy and to whom the copy was distributed.

⁷ [Regulation \(EU\) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data \(United Kingdom General Data Protection Regulation\) \(Text with EEA relevance\) \(legislation.gov.uk\) \(Articles 9 & 10\)](#)

The system manager must satisfy themselves that distribution of any data so processed is done so for the purposes described in the ICO data register and to the recipients permitted under the register entry.

- 4.4. All recording media and images belongs to and remains the property and copyright of Trinity Hall. Data will be stored under a specified retention period (currently 30 days) and processed in accordance with the relevant sections of the Data Protection Act 1998 and/or the General Data Protection Regulations (UK).
- 4.5. The use of covert cameras will be restricted to rare occasions with written authorisation and at the request of the Head Porter / Junior Bursar; and where it has been assessed by the Senior Officers Group (Master, Senior Tutor, Vice Master and Bursar) and the College Compliance Officer:
- that informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording;
 - that there is reasonable cause to suspect the welfare of a College member is at risk;
 - that the recording is not in any members private space i.e. student bedroom or College changing area;
 - That resort to covert recording is, in all the circumstances, proportionate given the impact this may have on the privacy and related interests of individuals.

The JCR and MCR Presidents will be consulted in confidence to ensure the use of covert cameras for one of the purposes listed above are understood and agreement reached The Head Porter / Junior Bursar should be satisfied that all other measures have been exhausted prior to the use of covert recording.

- 4.6. Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording to capture evidence of the specific suspected unauthorised activity. The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom and whether any steps can be reasonably taken to reduce collateral intrusion.

Any data collected will be dealt with under the principles set out elsewhere within this policy and, where appropriate, an e-mail will be sent to College members confirming the action that has been taken.

5. Compliance with Data Protection Legislation

In its administration of its CCTV system, Trinity Hall complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Due regard is given to the data protection principles embodied in GDPR. These principles require that persona data shall be:

- i. Processed lawfully, fairly and in a transparent manner;

- ii. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- iii. Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- iv. Accurate and, where necessary, kept up to date;
- v. Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- vi. 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.

Trinity Hall meets the requirements of Schedule 1, paragraph 10 of the Data Protection Act 2018 are met by ensuring that processing;

(a) is necessary for the purposes of the prevention or detection of an unlawful act,

(b) must be carried out without the consent of the data subject so as not to prejudice those purposes, and

(c) is necessary for reasons of substantial public interest.

(2) If the processing consists of the disclosure of personal data to a competent authority, or is carried out in preparation for such disclosure, the condition in sub-paragraph (1) is met even if, when the processing is carried out, the controller does not have an appropriate policy document in place (see paragraph 5 of this Schedule).

(3) In this paragraph—

“act” includes a failure to act;

“competent authority” has the same meaning as in Part 3 of this Act (see section 30).

6. Applications for disclosure of images

Applications by individual data subjects

- 6.1. Requests by individual data subjects for images regarding themselves “Subject Access Request” should be submitted in writing to the College’s Compliance Officer together with proof of identification. Further details of this process are detailed on the College’s Governance webpage:
www.trinhall.cam.ac.uk/about/college-governance/data-protection/
- 6.2. In order to locate the images on the College’s system, sufficient detail must be provided but the data subject in order to allow the relevant images to be located and the data subject to be identified.

Access to and disclosure of images to third parties⁸

- 6.3. Where the College is unable to comply with a Subject Access Request without disclosing the personal data or 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.
- 6.4. A request for images made by a third party should be made in writing to the Head Porter.
- 6.5. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relations to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 6.6. Such disclosures will be made at the discretion of the Head Porter / Junior Bursar, with reference to relevant legislation and, where necessary, following advice from the College's Compliance Officer.
- 6.7. Where a suspicion of misconduct arises and at the formal request of the investigating officer, Director of HR or Junior Bursar, the Head Porter may provide access to CCTV images for use in staff disciplinary cases.
- 6.8. The Head Porter may provide access to CCTV images to investigating officers / Dean of Discipline when sought as evidence in relation to student discipline cases.
- 6.9. A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Retention of images

- 7.1. 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.
- 7.2. Where an image is required to be held in excess of the retention period referred to in 7.1., the Head Porter or Deputy Head Porter will be responsible for authorising such a request.
- 7.3. 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.

⁸ Article 5(1)(b) and 5(1)(f) of the UK General Data Protection Regulation

- 7.4. Access to retained CCTV images is restricted to the Head Porter, Deputy Head Porter and Junior Bursar, and other persons as required as authorised by the Head Porter.

8. Complaints Procedure

It is recognised that members of Trinity Hall and others may have concerns or complaints about the operation of the system. Any complaint about the operation of the system should be addressed in the first instant to the Head Porter. Concerns or enquiries relating to the provisions of the UK General Data Protection Regulation may be addressed to the Compliance Officer.

9. Governance

- 9.1. The responsible officer for this policy is the Junior Bursar.
- 9.2. Implementation of this policy will be after consideration and consultation with affected parties and College members.
- 9.3. This policy and the procedures contained herein will be considered and reviewed by the Junior Bursar, Compliance Officer and the Head Porter to review operational effectiveness.

Version Control Table

Version	Date	Major Change	Approved	Owner
1.0	N/A	Draft	Junior Bursar	Junior Bursar
1.1.	N/A	IT Advisory Group (ITAG) Review	ITAG	ITAG
1.2.	N/A	Data Protection Review	Fellow	?
1.3.	06.06.2016	Clarification and Editing	Fellow	?
1.4.	14.03.2017	Minor Amendment by Fellow	Governing Body	Governing Body
1.5.	17.03.2017	Uploaded to Intranet	Junior Bursar	Junior Bursar
2.1	03.06.2018	Students' Observations	Governing Body	Governing Body
3.1.	06.05.2022	Review & update	Not Approved	Junior Bursar
4.1	01.09.2023	Review and Update	Not Approved	IT AG
4.2	20.10.2023	Comments from IT AG		