



# HARTPURY

## CCTV MANAGEMENT POLICY

### 1. Scope

- 1.1. The purpose of this policy is to regulate the management, operation and use of the image only, CCTV system at Hartpury. Cameras are in continual operation and will be used if required, to monitor activities within buildings, on the Hartpury estate, car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of Hartpury buildings, staff, students and visitors. There will be no live monitoring of the system.
- 1.2. Automatic Number Plate Recognition (ANPR) is used at the main entrance to campus and any references to CCTV throughout this document also apply to ANPR.
- 1.3. CCTV monitoring and recording systems will only be installed in or on Hartpury property when this has been reviewed by the Hartpury Campus Security Team and approved a member of the SMT.
- 1.4. The system comprises a number of fixed and fully functional (Pan/Tilt/Zoom) cameras located in most buildings including residential accommodation and externally in appropriate locations across the campus grounds. These are monitored by appropriate staff.
- 1.5. Hartpury's use of the CCTV complies with the requirements of the Data Protection Act and, where applicable, the Regulation of Investigatory Powers Act 2000. Hartpury is registered with the Information Commissioner Office as a Public Authority
- 1.6. This policy document will be subject to review annually to include consultation as appropriate with interested parties such as the Hartpury Students' Union.
- 1.7. The CCTV system is owned by Hartpury University & College.
- 1.8. Independently installed and operated CCTV systems by staff/students will not be permitted on any campus property and where found, actions will be taken to close these systems down.

### 2. Objectives of the CCTV Policy

To assist in the prevention and detection of crime.

- 2.1 To facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order.
- 2.2 Protect Hartpury property.

- 2.3 Ensure a safer environment within the campus particularly in respect of Safeguarding protections applicable to students
- 2.4 Support the Police in a bid to deter and detect crime, by providing evidence in support of an enquiry or prosecution.
- 2.5 To assist with the identification of actions that may result in any Behaviour Management investigations involving students or disciplinary matters for staff
- 2.6 To monitor and assist with traffic management issues on campus.
- 2.7 To reduce the fear of crime and to reassure students, staff and visitors.

### **3. Management of the CCTV System**

- 3.1 The CCTV operation will be administered and managed by the Head of Student Safety & Resilience in accordance with the principles and objectives expressed in the policy document.
- 3.2 Staff access is restricted to the Head of Student Safety & Resilience, Residential Support Team and IT (for system maintenance). The Head of Student Safety & Resilience will review access rights on an annual basis. All staff users must be approved and authorised by a member of the Senior Management Team and the Head of Student Safety & Resilience. In exceptional circumstances, access can be approved by a member of the Senior Management Team and/or the Head of Student Safety & Resilience
- 3.3 Unauthorised persons will not be permitted to access the system at any time
- 3.4 The day-to-day management will be the responsibility of the Head of Student Safety & Resilience supported by the Residential Support Team.
- 3.5 All cameras will be monitored by authorised staff via the 'Milestone' online platform which will be maintained by the IT Department
- 3.6 Notwithstanding there will be no live monitoring of cameras, the CCTV will be in operation 24 hours a day, 365 days of the year.
- 3.7 If out-of-hours emergency maintenance is required, the IT Support Emergency Help Line must be contacted.
- 3.7 Warning signs, as required by the Code of Practice of the Information Commissioner, will be placed at all access routes to areas covered by the CCTV.
- 3.8 Liaison meetings may be held with all internal and external agencies involved in the support of the system.

### 3.9 System Control – Monitoring Procedures

- 3.9.1 On a daily basis, the Head of Student Safety & Resilience and Residential Support Team Staff will check and confirm the efficiency of the system, in addition, the Head of Student Safety & Resilience will undertake monthly checks on all residential building CCTV ensuring that:
- the cameras are functional
  - the equipment is properly recording
  - the field and angles of view are capturing information as intended (This will form part of monthly checks)
- 3.9.2 Access to the CCTV will be strictly limited to the Residential Support Team Staff and specific authorised persons.
- 3.9.3 An annual review of CCTV DPIA's will be undertaken by the Head of Student Safety & Resilience or nominated person.
- 3.9.4 Unless an immediate response to events is required, operators must not re-direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained from the Head of Student Safety & Resilience for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.
- 3.9.5 Recording is carried out on digital data apparatus. These are located within the IT department.
- 3.9.6 Recorded data will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recorded data will never be released to the media for purposes of entertainment.

### 3.10 Exemptions

- 3.10.1 The CCTV is designed to ensure maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover all parts of the campus and wider areas and/or detect every single incident taking place.
- 3.11 Retention and disposal of material
- 3.11.1 Footage will be stored on data recorder hard drives for up to 30 days.
- 3.11.2 Footage will be provided via USB if requested by external agencies in the process of detecting crime and in the prosecution of offenders in accordance with GDPR.
- 3.11.3 All still photographs and hard copy prints will also be securely disposed of as confidential waste.

## 4. **Digital Recording Procedures**

### 4.1. Rules for retention of data

- 4.1.1 In order to maintain and preserve the integrity of the Digital Video Recorder (DVR), hard disks used to record events from the CCTV cameras and the facility to use them in any future proceedings, the following procedures for their use and retention of data must be strictly adhered to:
  - 4.1.2 Each DVR must be identified by a unique mark or serial number. This is maintained by the IT department.
  - 4.1.3 Each DVR must be kept in a secure location with access restricted to authorised staff.
  - 4.1.4 The Head of Student Safety & Resilience or nominated deputy, in liaison with the IT department, shall check daily to ensure the system is operational.
  - 4.1.5 A disk required for evidential purposes must be of the CD-R type or USB storage only, both will be provided in pairs each carrying an identical identification number, one a Master to be retained by Hartpury, the other a copy which can be released to the police or other authorised third party on production of a signed data access request form.
  - 4.1.6 The disk / USB should be loaded with the required CCTV data and viewer programme; identical information should be loaded on both Master and copy disks / USB
  - 4.1.7 Each disk / USB should be sealed in its own case, the Master Copy should be kept in a secure storage drawer. The Copy disk / USB is handed to the person making the request on production of positive ID such as Police Warrant Card, Picture ID Card, Driving Licence, etc.
  - 4.1.8 The record sheet should then be completed and the Copy disk signed for and counter signed by the Head of Student Safety & Resilience or nominated deputy.
  - 4.1.9 All captured CCTV footage relating to an incident investigation will be stored as long as such a time it is no longer required i.e. completion of any formal process. Permanent deletion will be the responsibility of the Head of Student Safety & Resilience or nominated deputy.
- 4.2. Dealing with official requests: use of CCTV in relation to criminal activities
- 4.2.1 CCTV recorded images may be viewed by the Police for the following:
  - 4.2.2 The prevention and detection of crime
  - 4.2.3 Authorised officers of Hartpury for supervisory purposes
  - 4.2.4 Authorised officers of Hartpury for discipline reasons
  - 4.2.6 Authorised demonstration and training
  - 4.2.6 The apprehension or prosecution of offenders
  - 4.2.8 For immediate action relating to live incidents, e.g. an immediate pursuit
  - 4.2.9 For the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings)

- 4.2.10 Is otherwise necessary for the purposes of establishing, exercising or defending legal rights
- 4.2.11 For major incidents that may occur
- 4.2.12 A record will be maintained of the release of Data on Disk / USB to the Police or other authorised applicants. A register will be available for this purpose
- 4.2.13 Viewing of CCTV images by the Police must be recorded in writing and entered in the log book. This will be under the management of the Head of Student Safety & Resilience. Requests by the Police can only be actioned under section 29 of the Data Protection Act 2018
- 4.2.14 Should a disk / USB be required for evidence; a copy may be released to the Police under the procedures described in paragraph 4.1.4 of this Code. Disks / USB will only be released to the Police on the clear understanding that they remain the property of Hartpury, and both the disk / USB and information contained on them are to be treated in accordance with this policy
- 4.2.15 Hartpury retains the right to refuse permission for the Police to pass to any other person the disk or any part of the information contained therein
- 4.2.16 The Police may require that Hartpury retain the stored disk(s) / USB for possible use as evidence in the future. Such disk(s) will be properly indexed and securely stored under the management of the Head of Student Safety & Resilience until they are needed by the Police
- 4.2.17 Applications received from outside bodies (e.g. solicitors) to view or release disks will be referred to the Head of Student Safety & Resilience. In these circumstance's disks will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, or in response to a Court Order. A fee can be charged in such circumstances.

## **5. Staff**

- 5.1 All staff involved in the operation of the CCTV will be required to have read and understood this policy.
- 5.2 Only authorised members of staff will have access to CCTV images.
- 5.3 The Head of Student Safety & Resilience will ensure that all staff involved with the operation of the CCTV are trained in respect of all operational, legal and administrative functions arising out of CCTV operation, including mandatory Hartpury information compliance testing.

## **6. Breaches of the policy – including breaches of security**

- 6.1 Any breach of the Policy by authorised users will be initially investigated by the Head of Student Safety & Resilience or his nominated deputy, in order for him/her to initiate the appropriate disciplinary action in liaison with HR.
- 6.2 Any serious breach of the policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

## **7. Assessment of the scheme**

- 7.1 Performance monitoring, including random operating checks, may be carried out by the Head of Student Safety & Resilience or nominated deputy.

## **8. Complaints**

- 8.1 Any concerns about the CCTV system should be addressed to the Head of Student Safety & Resilience.
- 8.2 Complaints will be investigated in accordance with the Hartpury Complaints Policy and Procedure – copy of the policy can be found via this link [Complaints 2022](#)

## **9. Access by the data subject**

- 9.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to access data held about themselves, including that obtained by the CCTV.
- 9.2 Requests for information, including Data Subject Access Requests, should be sent to: Gillian Steels, Clerk to the Corporation [Gillian.Steels@hartpury.ac.uk](mailto:Gillian.Steels@hartpury.ac.uk) 01452 702159.

## **10. Complaints and Contacts**

- 10.1 The Head of Student Safety & Resilience is responsible for the operation of the CCTV system, and compliance with this policy. Any concerns in respect of the system's use or regarding compliance with this policy should be addressed to the Head of Student Safety & Resilience and/or the Hartpury Complaints Policy and Procedure
- 10.2 Contacts:

Head of Student Safety & Resilience  
01452 702131  
[Darryl.Hill@hartpury.ac.uk](mailto:Darryl.Hill@hartpury.ac.uk)

Deputy Principal – Resources  
01452 702459  
[Lesley.Worsfold@hartpury.ac.uk](mailto:Lesley.Worsfold@hartpury.ac.uk)

Head of IT  
01452 702626  
[Matthew.Reeve@hartpury.ac.uk](mailto:Matthew.Reeve@hartpury.ac.uk)

## REVIEW CYCLE

<b>DATE LAST APPROVED</b>	September 2022
<b>POLICY OWNER</b>	Head of Student Safety & Resilience
<b>APPROVING COMMITTEE</b>	Exec
<b>STATUS</b>	Approved
<b>NEXT REVIEW DATE</b>	August 2023

## RELATED DOCUMENTS:

1. General Privacy Policy
2. Acceptable Use Policy
3. Accommodation Licence 2022/23
4. Residential Handbook 2022/23

## EQUALITY, DIVERSITY AND INCLUSION

As with all Hartpury policies and procedures, due care has been taken to ensure that this policy is appropriate to all members of staff and students regardless of their age, disability, ethnicity, gender, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sexual orientation and transgender status.

The policy will be applied fairly and consistently whilst upholding Hartpury's commitment to providing equality to all. If any employee feels that this or any other policy does not meet this aim, please contact the HR Department.

Hartpury is committed towards promoting positive mental health and aims to create a culture of support where staff and students can talk about mental health problems without the fear of stigma or discrimination.