CCTV Policy

BLOOMSBURY
INSTITUTE
LONDON

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Committee Approval

Committee	Committee Action	Date
SMT	Approved	1 March 2023
	Date in force	**3 March 2023**

The CCTV Policy will be reviewed annually by our Senior Management Team. Any amendments require the approval of our Senior Management Team. A review may also be carried out if there are changes to any legislative requirements.

1. Introduction

Bloomsbury Institute ("the Institute") operates a CCTV surveillance system ("the system") throughout its premises, with images being monitored and recorded on each site. The system is owned and managed by the institution and operated by the Estates and Facilities Department with first level technical and networking support provided by the IT Services Department.

2. Compliance

Images obtained from the system (which include recognisable individuals) constitute personal data and are covered by the Data Protection Act 2018 and the UK GDPR. This Policy should therefore be read in conjunction with the Institute's Data Protection Policy, Confidentiality Policy, Privacy Notice, Freedom of Information Policy[1], the Data Protection Act (2018) Code of Practice[2] and the UK General Data Protection (GDPR)[3].

Bloomsbury Institute is the registered Data Controller under the terms of the Data Protection Act 2018. The Data Protection Officer for the Institute is the Compliance Manager (dpo@bil.ac.uk), who is responsible for ensuring compliance with the Act.

This policy has been drawn up in accordance with the advisory guidance contained within the Information Commissioner's Guidance on Video Surveillance[4] and the Home Office Surveillance Camera Code of Practice[5].

3. Purpose

The Institute's registered purpose for processing personal data through use of the system is crime prevention and/or staff/student monitoring for legitimate purposes. This is further defined as:

- CCTV is used for maintaining public safety, the security of property and premises and for preventing and investigating crime. It may also be used to monitor staff when carrying out work duties. For these reasons, the information processed may include visual images, personal appearance and behaviours. This information may be about staff, customers and clients, members of the public and those inside or entering the building, or in the immediate vicinity of the area under surveillance.

- Where necessary or required, this information will be shared with the data subjects themselves, employees and agents, service providers, police forces, court or tribunal, security organisations and any qualified persons making an enquiry.

The operators of the system will have received any training necessary including the impact of such systems on individuals and their right to privacy. All staff must be made aware of and follow the Institute's Privacy Notice and Data Protection Policy.

Full details of the institutes data protection registration are available on the Information Commissioner's Office website[6].

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[1] These policies can be found at https://www.bil.ac.uk/qem/policies/.

[2] https://www.legislation.gov.uk/ukpga/2018/12/contents/enacted

[3] https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/

[4] https://ico.org.uk/for-organisations/guide-to-data-protection/key-dp-themes/guidance-on-video-surveillance-including-cctv/

[5] https://www.gov.uk/government/publications/surveillance-camera-code-of-practice

[6] https://ico.org.uk/

4. Description

The system is intended to produce images that are as clear as possible and appropriate for the purposes stated. The system is operated to provide (when required) information and images of evidential value.

Cameras may be located at strategic points throughout the institute's estate, principally at the entrance and exit points of buildings, in rooms with high value contents (e.g., Computer Labs and Server Rooms), and main thoroughfares.

A secondary CCTV system is installed to cover the Bloomsbury Radio studio but no other spaces on our campus.

Signage is prominently placed at strategic points on the estate to inform staff, students, and visitors that CCTV installation is in use.

5. Operation

Images captured by the system are recorded continuously and may be monitored by Estates and Facilities staff trained and designated as CCTV Operators. Images displayed on monitors are not visible from public areas and access to the system is strictly limited.

All Estates and Facilities staff working with the system are made aware of the sensitivity of handling CCTV images and recordings. The Estates and Facilities Manager will ensure that authorised staff are fully briefed and trained in all aspects of the operational and administrative functions of the system. In addition to this all staff must complete mandatory UKGDPR training.

IT Services are classed as operators as they may be needed to resolve connectivity issues. They will not be asked to perform any surveillance or data gathering tasks and will be used only to maintain the system.

6. Information retention

No more images and information shall be stored than is required for the stated purpose. Images will be deleted once their purpose has been fulfilled. Images and footage will be overwritten on a 30-day rolling basis. (The secondary CCTV system runs on a 14-day rolling basis).

Information used as a reference database, such as still images for facial recognition purposes by the automated system, will be accurate and kept up to date until such time as they become unnecessary. At this point, they will be deleted, usually after a period of 12 months after the person has left Bloomsbury Institute.

In the case of events of interest, which may include, but are not limited to, proof of theft or proof of violence, the images will be stored until such time as they are no longer required.

7. Access

All access to recorded images is restricted to those who need to have access in accordance with this policy, the Institute's Confidentiality Policy, Data Protection Policy, Privacy Notice, Freedom of Information Policy[7], the Standard Operating Procedures ("SOPs") and any governing legislation. The main users and operators of the system are the Estates and Facilities team and the IT Services team. The secondary CCTV system access includes the above, the Deputy CEO and those persons who have been authorised by the latter.

Disclosure of recorded material will only be made to third parties in accordance with the purposes of the system and in compliance with the Data Protection Act 2018.

[7] These policies can be found at https://www.bil.ac.uk/qem/policies/

Subject Access Requests should be addressed to dpo@bil.ac.uk.

8. Related regulations, policies, and procedures

- External
  - Data Protection Act 2018
  - UK General Data Protection Regulation (UK GDPR)
  - A data protection code of practice for surveillance cameras and personal information
  - Surveillance camera code of practice
- Internal
  - Data Protection Policy
  - Privacy Notice
  - Confidentiality Policy
  - Freedom of Information Policy

9. Contact Us

Students and visitors should address any concerns, complaints, or queries over the use of the Institute's CCTV system to

Email: estates.facilities@bil.ac.uk
Telephone: +44 (0) 20 7078 8840
Post: Estates and Facilities Manager, Bloomsbury Institute, 7 Bedford Square, London WC1B 3RA

10. Review

This policy is produced by Estates and Facilities and approved by the Senior Management Team (SMT). It will be reviewed annually by Estates and Facilities for ratification by the SMT. A review may also be carried out if there are changes to any legislative requirements.