

Policy Governing the Operation of CCTV at SOAS

1. Purpose

- 1.1 This policy outlines how the School of Oriental and African Studies (SOAS) will use and manage closed circuit television (CCTV).
- 1.2 The policy recognizes and addresses the fact that whilst CCTV can have many positive benefits for SOAS, its staff, students and others in terms of their safety and security, it can also raise concerns over privacy.
- 1.3 This policy has been developed in line with the Information Commissioner's [CCTV Code of Practice](#) (2008).

2. Roles and Responsibilities

- 2.1 The **Director of Estates & Facilities** (DEF) is ultimately responsible for this policy. This includes raising awareness of its requirements, taking measures to ensure its implementation, and regular review of its requirements to ensure that it remains fit for purpose. The DEF or their nominee is responsible for deciding whether CCTV footage or images can be disclosed and for keeping a record of all such disclosures.
- 2.2 The **Head of Facilities Management** (HFM) will be responsible for the day-to-day implementation of this policy.
- 2.3 **SOAS staff and contractors** who work with CCTV or have access to CCTV images (recorded or viewed live) are responsible for ensuring that they are aware of and follow the requirements of this policy and any associated procedures, guidelines and contracts. This includes ensuring that requirements for the security of CCTV footage are observed.
- 2.4 The **Information Compliance Manager** (ICM) provides advice on how to ensure that SOAS use of CCTV complies with the Data Protection Act 1998 and related guidance provided by the Information Commissioner's Office.

3. Policy Statement

- 3.1 **Reason for use of CCTV.** Closed circuit television (CCTV) is installed and operated at SOAS to ensure that SOAS premises are safe and secure for all those who use them. CCTV is used to prevent crime; to monitor areas where it is judged there is real risk to safety, or of a breach of security, so that safety and security issues can be responded to swiftly; and to facilitate the investigation of incidents. CCTV images may be used in the investigation of suspected or actual criminal activities, alleged breaches of SOAS rules and

regulations by staff, students or the employees of contractors, and health and safety incidents.

- 3.2 **How images will be viewed.** Images from the installed cameras may be either viewed or recorded or both viewed and recorded.
- 3.3 **Positioning of cameras.** Cameras may be positioned anywhere on SOAS premises that security or safety considerations require. Cameras will be visible. Cameras will be located in positions that minimise viewing of spaces that are not relevant for the maintenance of security and health and safety at SOAS. In particular, cameras will not be sited to capture images of areas where individuals would have heightened expectations of privacy, for example in or around toilet or changing facilities.
- 3.4 **Signage.** Signs will be positioned at the entrance to all SOAS premises where CCTV operates. These signs will indicate that CCTV monitoring and recording are in use on the premises.
- 3.5 **Recording, storage and retention of CCTV images.** Recordings may be made from any CCTV cameras. These recordings may include a date, time and system information overlay. Recording equipment will be housed in secure areas to which only security staff have access. Recordings will be kept for a maximum of fifteen days, unless required as part of an ongoing investigation, in which case recordings will be retained for as long as required for that investigation. The images are recoded and held as digital media in secure locations and accessed through password protected software applications. Access to this storage is restricted to the HFM, and to security staff. Unless required for an ongoing investigation, the images are overwritten by new information after a period no longer than 15 days.
- 3.6 **Viewing of live CCTV images.** Display equipment used to view the images from CCTV cameras will be located and positioned in such a way as only those responsible for security may ordinarily see the screen. Where display equipment is provided for controlled access security at a particular place such as a door entry point, display equipment will be located and positioned in such a way that only those likely to operate the system can view the image.
- 3.7 **Disclosure of recorded CCTV images.** There are limited circumstances under which individuals other than those responsible for security at SOAS will be allowed to view or obtain copies of recorded CCTV images. These circumstances are outlined below. In all these circumstances, the DEF or their nominee must decide whether disclosure is justified and keep a record of the decision and all disclosures.
- 3.7.1 **Internal investigation.** SOAS staff and occasionally other individuals (eg a student who is a witness to an incident) may be shown recorded images

- to assist in the identification of individuals or to otherwise facilitate an investigation into suspected or actual criminal activities, alleged breaches of SOAS rules and regulations by staff, students or the employees of contractors, and health and safety incidents.
- 3.7.2 **Subject access request.** Individuals have the right to request access to CCTV images relating to themselves under the Data Protection Act. Requests must be directed to the ICM in accordance with SOAS's procedures for Data Protection requests: see Data Protection Act: Requesting Access to Personal Data for further information. Individuals submitting requests for access will be asked to provide sufficient information to enable the images relating to them to be identified. The School reserves the right to refuse access to CCTV images where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.
- 3.7.3 **Police or security services investigation.** Under normal circumstances, the School will only pass CCTV images to police once in the possession of a form certifying that the images are required for an investigation concerning national security, the prevention or detection of crime, or the apprehension or prosecution of offenders, and that the investigation would be prejudiced by a failure to disclose the information (these forms are normally referred to as section 28 or 29 forms). Advice should also normally be sought from the ICM where possible. In emergency situations (i.e. where there is danger of injury or death to an individual or individuals), the HFM may authorise the disclosure of CCTV images without receiving such a form first. More details can be found in the School's [Police Disclosure Guidelines](#).
- 3.7.4 **Other disclosures.** The DEF or their nominee may authorize other disclosures consistent with the Data Protection Principles. The ICM should be consulted before making such an authorization.
- 3.8 **System maintenance.** Display equipment and recordings may be viewed by personnel authorized to undertake installation and maintenance of the CCTV systems. Such viewing will be restricted to that necessary for system work, and a record will be kept of the nature of the work and recordings that have been accessed for such purposes.
- 3.9 **Auditing.** The HFM will conduct regular checks (at least annually) on compliance with this policy and related procedures. Annual checks of CCTV equipment and software will be carried out to ensure that they are functioning properly. Where date, time and system overlays are used, annual checks will ensure that these are accurate. A record will be kept of all such checks.

- 3.10 **Reviewing use of CCTV.** The DEF will annually review whether the School's use of CCTV remains proportionate and fit for purpose.
- 3.11 **Contractors.** The DEF will ensure that contracts with third parties who provide security services to the School include requirements for their staff to comply with this policy and related procedures.
- 3.12 **Complaints.** Concerns and complaints over the use of CCTV at SOAS should be directed in the first instance to the Head of Facilities Management in the Estates and Facilities Directorate, SOAS, Thornhaugh Street, Russell Square, London WC1H 0XG. Further recourse may be made through the appropriate formal complaints procedure of the School. (eg students may complain through the Student Complaints Procedure; members of the public through the Public Complaints Procedure).

4 Training and communication

- 4.1 The HFM will ensure that all staff who use or have access to CCTV are aware of this policy and any related procedures.
- 4.2 The HFM will ensure that all staff who use or have access to CCTV receive training in confidentiality, privacy and Data Protection Act considerations that arise from the use of CCTV.

5 Definitions

- 5.1 Nominee – the DEF may nominate a member of Estates & Facilities staff in specified circumstances to conduct activities or make decisions on his/her behalf. The nominee would usually be the Head of Facilities Management
- 5.2 Security staff – security staff are individuals employed by SOAS or companies contracted by SOAS to maintain the security of SOAS premises.

6 Reviewing this policy

- 6.1 This policy will be reviewed regularly and in any case within 4 years.

|
Updated May 2023