

UNIVERSITY OF BATH

**Closed Circuit Television Systems Operated
on the Campus of the University of Bath**

A CODE OF PRACTICE

**This Code has been prepared with advice and co-operation from the
Avon and Somerset Constabulary and Bath and North East Somerset Council**

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CONTENTS – INDEX

	<u>Page No</u>
1. Introduction	1
2. Objectives of the Scheme	2
3. Data Protection	4
4. Changes to the Code	5
5. Responsibilities of Scheme Ownership	5
6. Management of the Scheme	5
7. Installation	6
8. Accountability	6
9. Public Information	7
10. Residential Areas	7
11. Assessment of the Scheme and Code of Practice	9
12. Staff	10
13. Complaints	11
14. Breaches of the Code including those of Security	11
15. Control and Operation of the Cameras	12
16. Access to and Security of Monitors/Control Room	14
17. Tapes and Recorded Material	15
18. Photographs	17
19. Dealing with Incidents	18
20. Police Contacts	19
21. Right of Subject Access	20
22. Prevention of Processing likely to cause damage/distress	21

CODE OF PRACTICE

1. INTRODUCTION

- 1.1 The University of Bath (the “University”) is the owner of a public closed circuit television system (CCTV) currently installed on the campus. The University may extend this system within conditions imposed under this Code to other premises which it controls off-campus. The Head of Security of the University of Bath is responsible for the system.
- 1.2 All materials produced by the system remain the property of the University. All materials and recordings remain subject to “copyright”. All rights are reserved.
- 1.3 The University has installed a number of overt colour CCTV cameras throughout the roads and car parks of the campus which are continuously recorded.
- 1.4 A Control Room is situated on level 2 Wessex House capable of receiving images from throughout the campus. The Control Room is staffed 24-hours a day by uniformed University Security Officers working in shifts for a period of 8 hours. The room contains video viewing and recording equipment, colour photographic printer and an electronic tape/wipe machine. A BT telephone line, facilitates communications between the Police and the Security Information Room.
- 1.5 The Control Room is also equipped with a Home Office licensed radio system linking the Room with uniformed Security Officers and Parking Wardens who provide mobile and foot patrols of the car parks.

2. OBJECTIVES OF THE SCHEME

- 2.1 “To provide a safe and secure environment for the benefit of those who might visit, work or live on the campus. Subject to this Code of Practice the scheme will not be used to invade the privacy of any individual in residential, business or other private premises, buildings or land.”
- 2.2 The system will only be used for the following purposes and within this Code of Practice at all times:
- (a) To reduce the fear of crime and to reassure students, staff and visitors.
 - (b) To prevent, deter and detect vehicle related crime, criminal damage and public disorder.
 - (c) To identify, apprehend and prosecute offenders in relation to crime, criminal damage, public order, and all forms of harassment cases.
 - (d) To provide the Police, the University, the Customs and Excise and the Health and Safety Executive with evidence upon which to take criminal and civil actions in the Courts.
 - (e) To monitor and assist with traffic management issues.
 - (f) To assist other “Emergency Services” in addition to the Police.
- 2.3 Circumstances may arise when the Police wish to conduct a pre-planned operation on campus. The use of this system within this Code and the presence of a Police Officer in the Control Room for this purpose is authorised.

- 2.4 Any use of this system or materials produced which is frivolous or for private purposes will be a matter of gross misconduct and will not be tolerated. A 24-hour record is kept of every use of every camera.
- 2.5 A formal decision will be made before the adoption of any changes in “purpose” or the adoption of the new objectives (below) for this scheme.
- 2.6 Any use outside these conditions may only be made personally by both the Head of Security and District Police Chief Superintendent.
- 2.7 The system will be used to respond to the following key objectives which will be subject to annual assessment and reports.
- (a) To detect, prevent or reduce the incidence of property crime and offences against the person.
 - (b) To reduce the theft of cars and theft from cars both on street and in car parks.
 - (c) To improve general security in the main campus roads both in terms of personal security and security of buildings and premises, and clearly make areas covered by the system more attractive in which to live, work and undertake recreational activities.
 - (d) Reduce graffiti (particularly offensive graffiti), vandalism and other criminal damage to improve the environment and reduce costs.
 - (e) Prevent and respond effectively to all forms of harassment and public disorder.

- (f) To improve communication and the operational response of Police patrols in and around the University campus.
- (g) To assist in traffic management.

Operational Manual

2.8 A detailed Operations Manual has been prepared by the University giving instructions on all aspects of the operation of the scheme. The manual is based on this Code of Practice, to ensure that the principles and purposes for which it is based are realised. It also contains health and safety issues. Circulation of this manual is restricted and is subject to University copyright. All copies will be stored separately.

3. DATA PROTECTION

- 3.1 The University is committed to complying with the requirements of the Data Protection Act 1998 and intends to operate the system in accordance with the eight data protection principles. The University will include the CCTV system on the University's data protection notification. The Head of Security will be responsible for ensuring that the registration covers the purposes for which the system is used.
- 3.2 All members of staff involved in operating the system will be made aware of the objectives of the scheme as set out in paragraph 2 of this Code and will be permitted only to use the system to achieve those objectives.
- 3.3 The University recognises the importance of strict guidelines in relation to access to and disclosure of recorded images and all members of staff should be aware of the restrictions relating to this set out in this Code and the rights of individuals under the Data Protection Act.

4. CHANGES TO THE CODE

- 4.1 Any major changes to this Code will only take place after consultation with the Bursar, Data Protection Officer and interested parties. This is particularly relevant should the scheme be extended into accommodation areas when the Students' Union will be consulted beforehand and increased privacy checks and safeguards incorporated into the system and Code of Practice.

A minor change may be made by the Head of Security in consultation with any School or Department affected by the change.

A major change is one as will have a significant impact upon the Code or upon the operation of the scheme. A minor change is such as one required for clarification only.

5. RESPONSIBILITIES OF SCHEME OWNERSHIP

- 5.1 The University is responsible for compliance with this Code of Practice and Operational Manual.
- 5.2 The University is responsible for requirements of accountability.
- 5.3 Any operational contractors will be required to comply with this Code and Operational Manual within any contract. They will also comply with specific qualifications, standards and the exclusion of staff responsible for breaches of discipline.

6. MANAGEMENT OF THE SCHEME

- 6.1 The Head of Security shall appoint a "Supervising Officer" responsible for:

- (a) day-to-day management of the system
- (b) ensuring that the procedures of this Code of Practice is complied with
- (c) security of the system

6.2 Either the Head of Security or the Supervising Officer will liaise regularly with a nominated Police Officer. All operational problems will be resolved by these nominees.

6.3 Access to recordings and the control room will comply with specific guidelines and be recorded and monitored.

6.4 The Operational Manual is linked to this Code.

7. INSTALLATION

7.1 Where cameras are to be installed in accommodation areas of the University the Students' Union shall be consulted in accordance with the part of the Code concerned with residential property.

7.2 The system has no facility for sound or sound recording.

7.3 Before installation of major technological changes that will have a significant effect upon the capacity of this system the implications will be fully assessed in relation to the purposes and key objectives of the scheme.

8. ACCOUNTABILITY

8.1 The Head of Security will report on the operation of the scheme in his Annual Report to the University's Executive and Heads of Departments.

8.2 No release of data received by the cameras shall be made other than in accordance with this Code or under the provisions of the Data Protection Act 1998.

9. PUBLIC INFORMATION

9.1 Cameras will not be hidden and as far as possible will be placed in public view.

9.2 Signs that CCTV cameras are operating are displayed at key positions at the perimeter of the scheme. The signs allow people entering the area to make a reasonable approximation of the area covered by the scheme. The signs identify the owners of the scheme.

9.3 The Code of Practice is available at the Control Room and will be emphasised in any publicity arranged to reassure students, staff and visitors.

10. RESIDENTIAL AREAS

10.1 Should the scheme be extended into accommodation areas the reason for the extension will be clearly identified.

10.2 Key objectives will be identified according to local need.

10.3 An assessment scheme will be adopted for the extension.

10.4 The installation process must involve extensive consultation with the Students' Union.

- 10.5 Camera locations and statement of purpose and key objectives will be the subject of consultation with the Students' Union but the University will ensure that equipment is sited in such a way that it only monitors those areas which are intended to be covered by the equipment.
- 10.6 The University is under an obligation to ensure that operational procedures and technological measures are adopted that impose restraints upon the use of cameras in connection with private premises and all staff involved in operating cameras will be made aware of the areas intended to be covered and the need to preserve the privacy of individuals in areas not intended to be covered by the scheme.
- 10.7 These requirements of the Code will be complied with before the adoption of any change in purpose or the adoption of new objectives for the scheme.
- 10.8 Management, supervision and audit of the scheme will pay particular regard to those aspects of the scheme which are intended to address individual privacy.
- 10.9 Regular evaluation of the scheme will include further consultation with the Students' Union.
- 10.10 Targeted observations of individuals will only be undertaken for specified reasons and for purposes and key objectives set out in the Code of Practice. Observations should be conducted in accordance with protocols established with the Police and subject to the Police and Criminal Evidence Act 1984 and Codes of Practice.

11. ASSESSMENT OF THE SCHEME AND CODE OF PRACTICE

- 11.1 The University is responsible for ensuring that the scheme is evaluated at regular intervals by the Supervising Officer and a suitably independent senior officer of the University nominated by the Bursar.
- 11.2 Evaluation will be conducted according to the following criteria:
- Impact on crime/damage/public order
 - Impact on key objectives
 - Operation of the Code
 - Whether the purposes which led to the scheme still exist
 - Whether the purposes or key objectives require change
 - Privacy of the individual
- 11.3 The results of the evaluations will be published to the University's Executive Committee. The results of evaluation will be taken into account in the future functioning, management and operation of the scheme.
- 11.4 Should the scheme be extended into primarily accommodation areas a monitoring and evaluation "group" will be established with a remit to continuously evaluate the scheme. This group will respond to changing circumstances on the ground, assessing whether problems change and with the ability to propose other initiatives.
- 11.5 The Supervising Officer will continuously monitor the operation of the scheme and the implementation of the Code of Practice.

- 11.6 The Bursar will appoint an officer with seniority who will introduce an element of professional authority and independent from the day to day management functions to conduct a regular audit of the scheme and Code of Practice.
- 11.7 Should the system be extended to accommodation areas, student confidence in the scheme will be addressed by the formation of an independent inspection group drawn from the Students' Union and the Department of Internal Audit. This group will be allowed access without notice and access to records. The group will require some training in the system.
- 11.8 In assessing the scheme the University shall take account of the number and nature of any complaints and for this purpose a record of any complaints or enquiries relating to the scheme shall be kept together with details of any action taken in response.

12. STAFF

The University will adopt:

- 12.1 Effective and fair systems of recruitment and selection of staff which include measures to ensure that the selection process provides for thorough validation of the suitability of candidates.
- 12.2 A requirement that staff must be qualified at a suitable level on appointment or be offered and be capable of meeting in-service training requirements.
- 12.3 A disciplinary procedure which incorporates compliance with the Code of Practice and operational requirements and makes plain the risk to staff in the event of breaches of the Code or misappropriation of recordings.

- 12.4 A requirement of confidentiality which can be enforced during and after termination of employment.
- 12.5 Systems of monitoring and supervision that ensure compliance with the Code of Practice and Operational Guidance.
- 12.6 The Operations Manual will state operators minimum performance levels.
- 12.7 All staff will be required to read and conform to the Code of Practice and Operational Manual before commencing Control Room duties on the first occasion.

13. COMPLAINTS

- 13.1 The system of complaints against the University generally will also include complaints regarding the CCTV system and its operation.
- 13.2 The annual report will include the number of complaints received, the number substantiated, and any action taken to remedy the complaint. Complaints against Policy will be referred to those conducting “evaluation”.

14. BREACHES OF THE CODE INCLUDING THOSE OF SECURITY

- 14.1 The Supervising Officer is primarily responsible for security.
- 14.2 Breaches of the Code of Practice and of security must be subject to proper investigation by, in the first instance, the person appointed to conduct the Audit. This person shall be responsible for making recommendations to the Head of Security to remedy any breach which is proved.

15. CONTROL AND OPERATION OF THE CAMERAS

- 15.1 Images captured by the system will be monitored in the Control Room. The monitors cannot be seen from outside the Control Room. The remote control of cameras, the use of all Control Room equipment will only be operated by the Supervising Officer, Control Room Staff and those under training. All staff will act with the utmost probity. As part of their terms of employment staff will attend training on privacy issues and be required to sign an appropriate confidentiality agreement.
- 15.2 All use of cameras and recording equipment will accord with the purposes and key objectives of the scheme, as developed in training and specific operational instructions to staff, and shall comply with this Code of Practice.
- 15.3 Cameras will not be used to look into private property. Operational procedures are adopted to impose restraints upon the use of cameras in connection with private premises. The scheme will be operated with a high degree of regard for the privacy of the individual.
- 15.4 Camera Operators will be subject to supervisory procedures to ensure compliance with this aspect of the Code.
- 15.5 Camera Operators are aware that recordings are subject to routine audit and that they may be required to justify their interest in a student, member of staff or visitor.
- 15.6 The Supervising Officer will decide the level of incidents to be reported to the Police. The Police will log all such incidents. It is agreed that the decision as to what level of response is deployed is a matter entirely for the Police. The Supervising Officer will liaise regularly with the Police on this subject.

15.7 The Operations Manual gives precise guidance on the method of operation of cameras, length of time viewing monitors and of minimum operators performance levels.

15.8 A record will be maintained as defined by the Supervising Officer of all monitored:

Passive Nuisances

Active Nuisances

Suspicious Person or Vehicle

Assaults

Crime in Progress including Escapes

Traffic Management Matters

Other Approved Purposes

This record will be included as part of the means of established effective evaluation and targeting of key objectives.

15.9 Although every effort has been made in the planning and design of the CCTV system to give it maximum effectiveness, it is not possible to guarantee that the system will detect every incident taking place on campus.

15.10 Cameras will be properly maintained and serviced to ensure that clear images are recorded. They will be protected from vandalism so far as possible to ensure that they remain in good working order.

15.11 If a camera is damaged then it will be the responsibility of the Supervising Officer to log this and arrange for repairs to be carried out at the earliest opportunity.

16. ACCESS TO AND SECURITY OF THE MONITORS/CONTROL ROOM

- 16.1 Access to view monitors, whether to operate the equipment or view the images is strictly limited to staff with that responsibility.
- 16.2 A Control Room Visitors Book will contain details of all recordings made in relation to 15.8 above. Details of any visitors and their Departments authorised by this Code including times of arrival and departure, signature and details of any telephone calls will also be recorded in the Visitors Book. All visitors to the Control Room acknowledge a confidentiality clause.
- 16.3 It is important that visits do not interrupt the efficiency of the system. Casual visits will not be permitted. Organised parties shall be allowed for lawful, proper and sufficient reasons to visit by the Head of Security or the Supervising Officer in advance. The Head of Security or the Supervising Officer will be present during all organised visits.
- 16.4 Visits by no more than 2 Police officers at any one time will be permitted provided they are on duty and in connection with liaison, training or purposes of the system.
- 16.5 Where a major incident arises where life or property are threatened by criminal action, the Police may take over the Control Room for the period that the incident causes such a threat. Permission will normally be obtained from the Head of Security but in the event of his unavailability, he or his deputy must be advised as soon as possible thereafter. Details of any such incident will be recorded in the log.
- 16.6 All aspects of security must be maintained and strictly honoured. Security procedures will be the subject of Audit.

16.7 An authorised operator will be present at all times when the equipment is in use. If the Control Room is left unattended for any reason the room must be secured to prevent unauthorised entry.

17. TAPES AND RECORDED MATERIAL

17.1 Recorded material will be used only for purposes defined in this Code of Practice. Access to recorded material will only take place as defined in the Code of Practice or as otherwise permitted under the terms of the Data Protection Act 1998. In particular recorded material will not be sold, copied, otherwise released or used for commercial purposes or the provision of entertainment. The showing of recorded material to the public will only be allowed in accordance with the law; either in compliance with the needs of the Police in connection with the investigation of crime, which will be conducted in accordance with the provisions of any relevant Code of Practice under the Police and Criminal Evidence Act 1984 and any advice and guidance given to the Police from time to time; or in any other circumstances provided by law.

17.2 Ownership of all recorded material remains that of the University who reserves all rights of Copyright.

17.3 Recording equipment will be checked from time to time by the Supervising Officer to ensure it is in good working order. A BT time check will be made nightly and the result entered into the log book. All tapes show the time, date, camera and operator numbers.

- 17.4 A library of tapes and spare tapes is maintained sufficient for the purpose. Tapes will be used a maximum of 12 times in rotation and retained a maximum of 31 days before re-use. Tapes required for evidential purposes must be stored separately and an additional copy made to maintain a full record of operational tapes retained for the stated period. This is in addition to evidential copies made. Tape retention policy has been made known to the Police. Previously recorded tapes will be electronically erased prior to reuse. After the end of their useful life tapes will be wiped clean and disposed of by incineration by the Supervising Officer who will endorse the main log to this effect.
- 17.5 Tapes are stored in a secure cabinet and the key held by the duty Senior Security Officer. Tapes are uniquely and individually labelled. Such labels bear "Copyright Reserved" notices.
- A register is maintained giving exact times and dates and use of each tape. (One register per recorder.) All tapes handed to the Police or others as evidence will be subject to entries in Registers which will also record details of all tapes removed, viewed but not copied. The names of the persons viewing and the reason will be also shown. All viewing will be in accord with the "purpose" statement. The tape registers are securely stored.
- Staff are aware that records and registers will be included in the Audit.
- 17.6 Tapes for evidential purposes will be regarded as exhibits. Tape copying procedures are as agreed with prosecuting authorities and details in the Operational Manual. Suitable labels, pro forma statements and packaging are immediately available.
- 17.7 Police may be given access to tapes where the Police reasonably believe that access and/or copies of specific tapes are necessary for the investigation and detection of an offence or offences or for the prevention of crime.

Tapes provided to the Police shall at no time be used for anything other than the purpose specified and identified when the tape is released to the Police by operators.

A Police Officer, not below the rank of Inspector, may visit the actual room from time to time to ensure that agreed procedures are being followed.

- 17.8 Access to tapes may be obtained in connection with civil disputes by Court Orders or be extended to lawyers acting for defendants or victims in criminal proceedings. No other access will be allowed unless approved by the Supervising Officer for reasons which fall within the purposes and objectives of the scheme and in accordance with this Code of Practice and/or the terms of the Data Protection Act 1998. All requests for access or for disclosure of tapes should be recorded.

18. PHOTOGRAPHS

- 18.1 Still photographs will not be taken as a matter of routine. The taking of photographs must be capable of justification. Each negative is numbered prior to loading into still image machines and each still photograph/negative will be the subject of written records.
- 18.2 Still photographs from live incidents will only be taken at the request of the Police Office in charge at the scene when the officer should be identified, and a record made of the request, with a log entry and the time and date of the request.
- 18.3 A Police Officer authorised by a Police Officer of at least the rank of Sergeant may request that the operator produces a still photograph taken at a live incident, or still photographs from video recordings. The authorising officer should be notified that the still photograph is required for the prosecution or detection of crime.

18.4 All still photographs will remain the property of the University and will be filed in numerical sequence. A record will be kept of the reason for any live photograph, date and time and an entry in the main log that a still photograph has been taken. The stills record book will include the details of the staff member taking the photograph.

Any still photograph released to the Police will be dealt with by the Police as an exhibit and shall at no time be used for anything other than the purpose specified when released to the Police.

Still photographs will only be destroyed by the Supervising Officer and within 31 days unless made the subject of a Police application or required as evidence. A record will be made of all photographs destroyed.

Photographs will not be used to brief operators to avoid contamination of operators evidence.

Photographs will be kept in a locked cabinet.

Procedures under this part of the Code will be the subject of a monitoring Audit. A Police Officer, not below the rank of Inspector, will be allowed access from time to time to check compliance with these requirements.

19. DEALING WITH INCIDENTS

19.1 The level of Police response to incidents reported to them in pursuance of local arrangements (15.6) is a matter entirely for the Police and will vary according to priorities appertaining at the time.

Operators will report relevant matters to other emergency services when a record will be maintained in the main log.

20. POLICE CONTACTS

- 20.1 For day to day purposes the liaison Police Officer will be the Inspector with responsibility for Southern Sector. The Bath Southern Sector Inspector will also be responsible for liaison on Audit and for decisions with significance for the operation and management of the scheme.

Access to the Control Room will be as specified in this Code, a record maintained to include the purpose of the visit.

The “purpose” criteria in dealing with incidents, use of exhibits and this Code must not be exceeded. Any variance will amount to a change in the Code of Practice and must be agreed in accordance with the Code before being implemented.

Telephone calls from the Police, the Officer involved, purpose of the call and outcome will be recorded in the Daily Log.

- 20.2 Police use of the system in any manner will comply with these Codes of Practice and not exceed them or exclude any aspect.

The presence of a Police Officer in the Control Room for a pre-planned operation or ongoing incident is permitted and this Officer may direct the operation of cameras which will always comply with this Code of Practice.

Should a request from the Police arise for use of the system in any manner that is not provided for by the Code of Practice, it must be the subject of specific agreement between the Head of Security and the District Police Chief Superintendent concerned. This cannot be delegated.

Any use of the system will be recorded in the main log together with the name of the Police Officer requesting such use. The Police will similarly maintain a record of requests for use of the system at live incidents or otherwise.

Control over use of the camera will ultimately rest with the camera operator in the Security Control Room.

21. RIGHT OF SUBJECT ACCESS

21.1 Members of staff, students and visitors have a right to request that they see images of themselves that have been captured on tape, subject to the payment of the relevant fee.

21.2 Any such request **MUST** be made in writing to the Head of Security or in his absence, the Security Manager who will deal with the matter promptly and in any case within 40 days. Before responding to the request advice will be sought from the University's legal advisers as to whether and to what extent information will be disclosed.

21.3 Any such individual is entitled to be told whether their personal data is being processed. If so, the person is to be given a description of:

- a) the personal data
- b) the purpose for which it is being processed and
- c) those to whom they are or may be disclosed.

21.4 Details shall not be provided where the personal data is held for the purposes of:

- a) the prevention or detection of crime
- b) apprehension or prosecution of offenders

The data controller is entitled to withhold personal data from a person making a subject access request where it has been adjudged that to disclose such would prejudice either a) or b) above.

21.5 Where a subject access request is not complied with, the following will be documented:

- a) the identity of the individual making the request
- b) the date of the request
- c) the reason for refusing to supply the images requested
- d) the name and signature of the member of staff making the decision.

21.6 Before responding to any such requests, advice will be sought from the University's legal advisers.

22. RIGHT TO PREVENT PROCESSING LIKELY TO CAUSE DAMAGE OR DISTRESS

22.1 The Data Protection Act provides that a notice may be served on the recording operator for the processing of personal data to cease in respect of a particular individual. Such a notice can only be served on the grounds that the processing in question is likely to cause substantial, unwarranted damage or distress to that individual or another person. Any such notice which is received must be passed to the Head of Security or in his absence, the Security Manager, who must deal with the matter within 21 days. Before responding to the notice advice will be sought from the University's legal advisers.