

CCTV policy

Introduction

Sheffield Hallam Students' Union (SHSU) uses closed circuit television (CCTV) images to provide a safe and secure environment for employees and for visitors to SHSU's business premises, such as students, contractors and suppliers, and to protect SHSU's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 1998, General Data Protection Regulation (GDPR) 2018 and the CCTV Code of Practice. SHSU is the 'data controller' for the images produced by the CCTV system and is registered with the Information Commissioner's Office (registration number is Z2367894).

SHSU's CCTV facility records images only. There is no audio recording i.e. conversations are not recorded on CCTV.

Purposes of CCTV

The purposes of SHSU installing and using CCTV systems include:

- To assist in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of SHSU's business premises.
- To ensure that health and safety rules and Company procedures are being complied with.
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to assist in providing relevant evidence.

Location of cameras

Cameras are located at strategic points throughout SHSU's business premises, principally at the entrance and exit points. SHSU has positioned the cameras so that they only cover communal or public areas on SHSU's business premises and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices.

All cameras are also clearly visible.

Appropriate signs are prominently displayed so that employees, students and other visitors are aware they are entering an area covered by CCTV and therefore have the option to not enter the premises.

Recording and retention of images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are

undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than 31 days. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 31 days. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Line managers involved with Company disciplinary and performance management processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The CEO of SHSU (or another senior director or Duty Manager acting in their absence) is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

Individuals' access rights

Under GDPR legislation, individuals have the right on request to receive a copy of the personal data that SHSU holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to:

Data Protection Officer,
Sheffield Hallam Students' Union,
The HUBS,
Paternoster Row,
Sheffield
S1 2QQ.

Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located. SHSU is entitled to charge £10 for this service and retains the right to do so if extensive resources are required to locate and supply the images. SHSU will always check the identity of the requestor making the request before processing it, so photo ID of the requester will be required. SHSU will respond promptly and in any case within 30 calendar days of receiving the request.

The DPO will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If SHSU is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Staff training

SHSU will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of relevant legislation with regard to that system.

Operation

SHSU's Events Supervisor is responsible for the day-to-day operation and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of SHSU's

use of CCTV. Any complaints or enquiries about the operation of SHSU's CCTV system should be addressed to them.