POLICY FOR THE USE OF CCTV SURVEILLANCE SYSTEMS

1. Introduction

The University of Worcester uses surveillance camera technology in order to provide a safe and secure environment for students, staff and visitors and to protect University property. This policy outlines the purpose, use, and management of the CCTV installations and other surveillance systems at the University of Worcester and the considerations it has made to ensure this is in accordance with other legislation including Data Protection and Human Rights.

1.1 The purpose of the use of CCTV installations and other surveillance camera technology is:

- to promote a safe community environment.
- to protect staff, students, visitors, and the assets of the University.
- to assist with the prevention, investigation and detection of crime and disciplinary offences in accordance with the University disciplinary procedures.
- to enable the apprehension and prosecution of offenders (including the use of images/data as evidence in criminal / civil proceedings).
- to monitor security of university buildings and areas.
- to assist in traffic management and parking enforcement.

1.2 The CCTV system will not be used:

- to provide recorded images for the internet.
- to record sound, with the exception of body worn videos (BWV) operated by PCSOs and Security. Individuals are warned when the BWVs are activated wherever possible and practicable.

1.3 The principles of the policy are:

- that individuals' rights are respected and protected.
- that the installations are operated fairly and within the law.
- that the surveillance CCTV system is operated for the purposes for which it was set up.
- that the recorded material/data stored is fairly and lawfully processed.
- that recorded material/data is adequate, relevant and not excessive for the purposes.
- that recorded material/data is accurate, securely stored, and not kept for longer than is necessary.

1.4 This policy and its operations will be subject to regular reviews and audits, no less than every two years.

2. CCTV System overview and definitions

2.1 The CCTV system includes approximately 388 cameras over four Sites:

- St Johns Campus, including Barrington House
- Severn Campus
- City Campus
- Lakeside Campus

2.2 Cameras are located in various areas around these campuses including:

- Car Parks, roadways, footpaths and other external areas
- Building and site entrances/exits
- Academic buildings
- Service buildings
- Bars & retail areas
- The Students' Union
- Residences

2.3 There are several types of cameras –

- Overt fixed – these record uncontrolled images e.g., reception desk, doors etc.
- Overt Pan, Tilt, zoom (PTZ) – these are controllable cameras that can follow vehicles or subjects when required.
- Body worn – used by security staff on patrol when dealing with drunkenness, violence and anti- social behaviour.
- Vehicle installed cameras used for driver safety.

For the purposes of this Policy all of the above are referred to as "CCTV"

2.4 The CCTV installations comprise all fixed cameras, signs, recording and playing equipment, information, material, data, and any ancillary equipment required for the operation of the installations (e.g., cabling, printers, power supplies).

2.5 Recorded material/data means any material recorded by the installations, either in digital or analogue form on CD, PC computer system hard drive, hard copy print, or any document copy. The recorded material/data are the property of the University of Worcester

2.6 The systems will be operated 24 hours per day, 365 days of the year by trained SIA (Security Industry Authority) licenced University Staff

3. CCTV Owners and Roles

3.1 The CCTV surveillance system is owned by the University of Worcester.

3.2 Roles

3.2.1 The Pro Vice Chancellor Finance & Resources has overall accountability for the system, with nominated individuals given authority to manage the day-to-day operations and ensure strict compliance with this policy.

3.2.2 The Assistant Director – Security & Operations is responsible for the management and operation of the system.

3.2.3 The Head of Security is responsible for the day-to-day management of the system

3.2.4 The University Secretary is responsible for overseeing and approving data to be released in accordance with data protection legislation.

3.2.5 The Information Governance Officer is responsible for the management of any requests for CCTV footage and ensuring compliance with data protection legislation.

4. Legal Compliance

4.1 The University's CCTV installations will be operated in accordance with applicable data protection legislation (defined as the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR) and Article 8 of the European Convention on Human Rights (ECHR)).

4.2 For the purposes of data protection legislation, the University of Worcester is the Data Controller. The University's Data Protection Officer is the University Secretary (infoassurance@worc.ac.uk)

4.3 The University has chosen to adopt the SIA licensing requirements.

5. Access to images

5.1 The ability to review recorded and live images is limited to authorised staff personnel including:

- Pro Vice Chancellor Finance & Resources
- Assistant Director of Security & Operations
- Head of Security
- Control Room Operators
- Security Team Leaders
- University Secretary
- Information Governance Officer
- Chief Executive of the Students' Union for footage recorded in the Students' Union

Access to recorded images may also be given to other members of the University or third parties by the University Secretary subject to the requirements of data protection legislation.

5.2 Other staff may view only live images, only as part of their day-to-day responsibilities.

5.3 The University will ensure that relevant staff have undertaken appropriate CCTV training.

6. Disclosure of Images to Third Parties (Excluding Data Subjects)

6.1 Disclosure of recorded images will be restricted and carefully controlled. This will ensure that the rights of individuals are protected, and that images can be used as evidence if required. Images can only be disclosed in accordance with the purposes for which they were originally collected and in accordance with the UK GDPR and Data Protection Act.

6.2 Access to recorded images will be restricted to those staff or external agencies who have a lawful basis to view them and will not be made more widely available. Viewing of recorded images shall only take place in a restricted area to which other employees, students or members of the public will not have access while viewing is occurring.

6.3 The Police and other law enforcement agencies may make an application to view, or for the release, of CCTV images and footage. These can only be released upon receipt of an appropriate GDPR request form, approved by the University Secretary, or in their absence the Information Governance Officer.

6.4 CCTV images and footage may on occasion be released when it is considered that is appropriate to do so under a relevant University procedure i.e. Staff or Student Disciplinary Procedures, Safeguarding Policy or in relation to Health & Safety concerns Requests for this data should be made to the University Secretary via the CCTV Request form , in the University Secretary's absence these may be approved by the Information Governance Officer.

6.5 Disclosure will be made where it is authorised by law or in compliance with a Court Order.

6.6 All requests should be made in writing to the University Secretary via the Information Assurance team (infoassurance@worc.ac.uk) within 9 days of the recording to ensure footage is not erased.

7. Individual Access Rights by Data Subjects

7.1 The UK GDPR gives individuals (data subjects) the right to access their personal data which includes CCTV images. All requests for access to images by data subjects should be made by using the CCTV Subject Access Request form

7.2 Aside for the provision in Section 6, CCTV images or footage can only be requested by the individual who appears in the image or footage. Where the recorded images contain the data of other 3rd parties, this will only be released if;

- the 3rd party data can be removed/redacted; or
- the 3rd party consents to the disclosure of their data; or
- it would be reasonable to disclose the data without the 3rd party's consent.

7.3 Applications from Data Subjects shall be considered in accordance with the University's Data Protection Policy

8. Retention and disposal

8.1 Unless required for evidential purposes or the investigation of a crime or otherwise required by law, recorded images will be retained for no longer than 9 days from the date of recording and managed in accordance with the University's Data and Records Retention Schedule

8.2 At the end of their useful life all images on discs will be erased and securely disposed of.

9. Complaints Procedure and Enquiry Service

9.1 Complaints received in relation to the use of the CCTV system should be made in writing in the first instance to the Pro Vice Chancellor Finance & Resources. Complaints will be acknowledged within 5 working days and a response will be made to the complainant within 20 working days. The grounds for appeal under this Policy are limited to procedural irregularity in the operation of this Policy (i.e. the University has unreasonably failed to follow its own procedures) or the emergence of new information which materially impacts on the decision. An appeal against the decision can be made to the University Secretary (unisec@worc.ac.uk) within 10 working days of receipt of the response to the complaint. The appeal will be acknowledged within 5 working days and a response will be made within 20 working days.

9.2 The disclosure of CCTV images falls under the data protection legislation. A requestor may therefore request an internal review of the decisions relating to the disclosure or image supply to the University's Data Protection Officer, the University Secretary. This request should be made in writing to(infoassurance@worc.ac.uk). A response will be made to the complainant within 20 working days, in line with data protection legislation. If the requestor remains dissatisfied with the response, they may make a complaint to the ICO via the ICO website https://ico.org.uk/make-a-complaint/

9.3 For general enquiries in relation to CCTV and this policy please email: Assistant Director Security & Operations - t.taylor@worc.ac.uk

10. Relevant Policies

Data Protection Policy
Data and Records Management Policy
Information Security Policy

Owner	University Secretary
Approved by	University Executive Board
Approval Date	30/07/2026
Version	3
Reviewed	July 2026.
Review Date	July 2027
Accessibility Checked	July 2026