



Name of Policy:	CCTV at Newnham College: Code of Practice
Date of Approval	April 2018 (Governing Body)
Approval Authority	Updated 19.09.25 Bursar
Date of next review	3 years following the date of approval
Administrator:	B Gafney; HR Manager

1) Introduction

The purpose of this paper is to set out the basis for the installation and use of a CCTV system at Newnham College.

2) General Purposes

Before installing and using CCTV and similar surveillance equipment, users are required to establish the purposes for which they intend to use the equipment. In the case of Newnham College, the purposes include:

- The prevention, investigation and detection of crime
- The apprehension and prosecution of offenders (including use of images in criminal proceedings)
- Monitoring the security of premises.

3) Responsibility for the proposed scheme

The Council will be responsible for the scheme. Overall responsibility lies with the Bursar (Data Protection Officer) and the Domestic Bursar, with delegation to other Heads of Department as appropriate (principally the Head Porter).

4) The reasons for using CCTV:

4.1 Newnham College is an open site

- The College buildings are situated within gardens open to the public, and grounds are habitually used by members of the public and local residents.
- The doors to the main range of buildings, which are inhabited by undergraduates, are automatically set to card access only; by the access control system, between 8pm (4pm between 1st Oct & 1st Apr) and 6.30am, daily. Between the times of 8pm and 6.30am, the only access into the College for non-members is through the Porters' Lodge front door.
- Between 6.30 am and the evening lock-up (either 8pm or 4pm above) there is open access and each student's room door is in effect a front door.

- The lock-up arrangements are kept under review and may be changed from time to time by the Domestic Bursary or by the Council.
- The openness is valued by the College, and access between buildings would be quite impractical if a regime of day-time locking up were to be imposed.
- Incidents and thefts do occur, however, and the CCTV cameras will be installed at strategic points such as vending machines, bicycle sheds and the street entrances to the buildings to assist in the prevention and detection of crime.

4.2 Car parking

There is increasing pressure on the car parks, which are used by the staff, Senior Members and some students, as well as visitors and contractors. The management of the car parks remote from the Porters' Lodge would be facilitated by the use of CCTV.

5) Processing data

It is intended that data would be processed only in furtherance of one of the purposes of the scheme, as set out in paragraph (2) above.

6) Data Protection

The College's Data Protection Registration includes provision for the use of CCTV. A paragraph concerning the use of CCTV is included in the College's Data Protection Policy.

7) Security and disclosure policies

7.1 Data on the CCTV system (a digital system) will be kept routinely for 30 days and destroyed automatically thereafter. During the 30-day period it will be backed up each night.

7.2 Members of the Porters' Lodge staff will be trained in the use of the CCTV system and in the data protection principles governing its operation, including the principle that the equipment must be used only in order to achieve the purposes for which it has been installed. Members of the Porters' Lodge staff will be made aware of the procedure which needs to be followed should access to recorded images be sought. Such access may only be authorised by the Head Porter, Deputy Head Porter or responsible College Officer. [See 11.1]

7.3 If data is processed for one of the purposes outlined at paragraph 2 above, for instance to make a CD for use in evidence in criminal proceedings, it will be kept in the Head Porter's safe. The data will be disclosed only to responsible College Officers and to the police. The data will be accompanied by the following documentation:

- The date and time on which the images were removed from the general system for use in legal proceedings
- The reason why they were removed from the system
- The name of the person removing the images

- The name(s) of any person(s) viewing the images. If this should include third parties, this will include the organisation to which the third party belongs
- The reason for the viewing
- The outcome, if any, of the viewing
- Any crime incident number to which the images may be relevant
- The location of the images. For instance, if the images are handed to a police officer for retention, the name and station of the police officer.
- The signature of the collecting police officer, where appropriate.

7.4 Viewing of recorded images will take place in a restricted area, normally the Head Porter's office.

8) Siting of equipment

8.1 Cameras will be sited to monitor only those spaces which are intended to be monitored, as approved by the Council. Where the system potentially covers private spaces within the College, they will be blanked out. If cameras cover neighbouring property, the owners will be consulted.

8.2 Signs will alert the public that they are entering a zone which is covered by surveillance equipment. The signs will be clearly visible and legible. They will cover the identity of the scheme's organisers, its purposes and the details of whom to contact regarding the scheme. The image of a camera will be used and the wording will read:

"This scheme is controlled by Newnham College. For further information contact 01223 335700".

9) Quality of images

9.1 A system has been chosen which satisfies the requirement for good quality images, i.e. adequate for the investigation and detection of crime.

9.2 A check to record the accuracy of the recorded location of cameras and the accuracy of date and time recorded will be made on a yearly basis. The Head Porter will normally undertake the check in mid-May.

9.3 The purpose of the siting of each camera and the physical conditions in which the cameras are located are recorded. The cameras are designed and constructed to be as vandal-proof as possible.

9.4 The CCTV system is not designed to meet the requirements of an automatic facial recognition system.

9.5 The cameras and system will be serviced on a yearly basis. A maintenance log will be kept in the Porters' Lodge in the CCTV file.

9.6 The procedures to be followed if a camera is damaged are as follows:

- The fault should be reported to the Head Porter

- The fault should be reported to the service provider within the next working day following the report of the fault
- If the Head Porter is absent, any member of the Porters' Lodge staff may report the fault
- The contract with the CCTV provider ensures 24-hour service
- The Head Porter has the responsibility for checking that the fault has been repaired, either on the next working day after the repair, or on his return from absence.

10) Access to and disclosure of images to third parties

10.1 Access to, and disclosure of, the images recorded by the CCTV system is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact should images be required for evidential purposes.

10.2 Access to recorded images is normally restricted to the Head Porter, the Deputy Head Porter, the IT Manager and to responsible College Officers.

10.3 All access to processed images will be documented.

10.4 Disclosure of the recorded images to third parties will only be made in limited and prescribed purposes, normally to one of the following:

- Law enforcement agencies where the images recorded would assist in a specific criminal enquiry
- Prosecution agencies
- Relevant legal representatives
- The media, at the request of law enforcement agencies and where it is decided that the public's assistance is needed in order to assist in the identification of victim, witness or perpetrator in relation to a criminal incident. As part of that decision, the wishes of the victim of an incident will be taken into account.
- People whose images have been recorded and retained (the "data subject") (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings).

10.5 All requests for access or for disclosures will be recorded. If access or disclosure is denied the reason will be documented. If access to, or disclosure of, the images is allowed, the following will be documented:

- The date and time at which access was allowed or the date on which disclosure was made
- The identification of any third party who was allowed access to or to whom disclosure was made
- The reason for allowing access or disclosure
- The extent of the information to which access was allowed or which was disclosed.

10.6 Recorded images will not be made more widely available, for instance by being made routinely available to the media or placed on the internet.

11) Access by data subjects

All staff involved in operating the equipment must be able to recognise a request for access to recorded images by data subjects.

11.1 Requests for access

- Any individual requesting access must complete a "CCTV Record Request Form" (these are available in the CCTV file in the Porters' Lodge).
- All Subject Access Requests will be dealt with by the Head Porter, the Deputy Head Porter, the Domestic Bursar or the Bursar.
- A copy of the "CCTV Record Request Form" will be given to the Bursar's Office for their records and to check that the request is, or is not, part of an ordinary Data Protection Subject Access Request.
- A fee of £10 will be charged and the search for the images requested will not be carried out until the fee has been received.
- One of these responsible people, with the assistance as necessary of a Computer Officer, will locate the images requested.
- The responsible person will determine whether disclosure to the individual will entail disclosing images of third parties.
- The responsible person will determine whether images of third parties are held under a duty of confidence.
- If third party images are not to be disclosed, the designated member of staff shall arrange for them to be disguised or blurred.
- The responsible person must provide a written response to the individual within 21 days of receiving the request setting out their decision on the request.

11.2 The Domestic Bursar will undertake a yearly review of the documented system in order to ensure that the provisions of the Code of Practice are being complied with. This will normally take place in mid-May.

11.3 A report will be made annually to the College Council, including sections on the location and maintenance of the cameras, on the number and nature of enquiries and complaints received. The results will be assessed annually by the College Council against the stated purpose of the scheme.

12) Complaints procedure

12.1 Any individual(s) having concerns about the CCTV system at Newnham College are requested to use the following procedure:

- Write to ask for a copy of the "CCTV Record Request Form", the Newnham College Code of Practice and the Information Commissioner's Code of Practice. The request should be addressed to the Domestic Bursar, Newnham College, Cambridge CB3 9DF.

- Follow the complaints procedure which is covered in section 6 of the “CCTV Record Request Form”.
- Return the “CCTV Record Request Form” with section 6 completed, together with a letter setting out your complaint, to the Bursar, Newnham College, CB3 9DF.

This procedure should be followed if you have a concern about either the use of the CCTV system at Newnham College, or about non-compliance with the provisions of the Information Commissioner’s Code of Practice.

Lockup times updated to reflect
current procedures

19.09.25

Bob Watson, Head Porter

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