



## **Name of Policy: CCTV Policy**

**RESPONSIBLE COMMITTEE:** Domestic and Establishment

**RESPONSIBLE OFFICER:** Principal Bursar

**LINKED DOCUMENTS:** Information Security Policy, Data Protection Policy

**Annual Review date:** Hilary term

### **Introduction**

St John's College has in place a closed circuit television system to provide a safe and secure environment for students, staff and visitors, and to protect College property.

This document sets out the accepted use and management of the CCTV system and images to ensure the College complies with the General Data Protection Regulation (GDPR) and associated legislation ('data privacy legislation'), the Human Rights Act 1998 (HRA), the Surveillance Camera Code of Practice issued under the Protection of Freedoms Act (POFA Code) and other legislation.

### **Purpose of CCTV**

The College has installed a CCTV system to deter crime, assist in prevention and detection of crime, assist with the identification, apprehension and prosecution of offenders and to maintain the security of College premises, property and equipment.

The system will be provided and operated in a way that is consistent with an individual's right to privacy.

The system will not be used to provide images to the world-wide web for entertainment purposes, record sound or disclose to third parties (unless disclosed to the police or Oxford University Proctors to identify a person).

### **Owner**

The CCTV surveillance system is owned by St John's College, Oxford.

Authority for use of CCTV and responsibility for CCTV use rests with the Governing Body of the College.

The Domestic Bursar is responsible for the day-to-day operation of the system in the College and ensuring compliance with this policy.

Contact details:



Domestic Bursar  
St John's College  
St Giles  
Oxford  
OX1 3JP  
Email: domestic.bursar@sjc.ox.ac.uk.

## **Overview of system**

The CCTV system runs 24 hours a day, 7 days a week.

The CCTV system is managed locally across the College by staff from contractors acting on behalf of the College and by in-house staff.

The CCTV system comprises fixed position cameras; pan tilt and zoom cameras; monitors; multiplexers; digital recorders and public information signs.

CCTV cameras are located at strategic points in College and at the Sports Ground, Bainton Road Nursery and Hart Synnot House. All cameras at the Sports Ground will be prevented from focusing on the frontages or rear areas of private residential accommodation, or images pixelated where appropriate.

CCTV signs are prominently placed in College and at the Sports Ground to inform staff, students, visitors and members of the public that a CCTV installation is in use.

Although every effort has been made to ensure maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

## **Data protection**

For the purpose of the GDPR and data privacy legislation, St John's College is a data controller and data processor.

CCTV digital images, if they show a recognisable person, are personal data and are covered by the GDPR and data privacy legislation. This policy is associated with the College's Data Protection Policy and Information Security Policy, the provisions of which should be adhered to at all times.

The College's Data Protection Officer can be contacted as follows:

Data Protection Officer  
St John's College



St Giles  
Oxford  
OX1 3JP

Email: data.protection@sjc.ox.ac.uk

The College is required to register its processing of personal data (including CCTV) with the Information Commissioner's Office (ICO). The College's ICO notification registration number is Z1862068, renewed annually in August.

## **Access to images**

### General

Access to images will be restricted to specifically authorised College staff and in line with the purpose of the system and the GDPR and data privacy legislation.

### Individuals

The GDPR and data privacy legislation gives individuals the right to access personal information about themselves, including CCTV images.

All requests for access to a copy of CCTV material should be made in writing to Principal Bursar, St John's College, OX1 3JP.

Requests for access to CCTV images must include:

- a) The date and time the images were recorded
- b) Information to identify the individual, if necessary
- c) The location of the CCTV camera
- d) Proof of Identity.

The College will respond promptly and at the latest within 30 calendar days of receiving the request. All requests must be accompanied with sufficient information to identify the images requested.

### Third parties

Disclosure of recorded material that has the capacity to identify people will only be made to third parties in strict accordance with the purposes of the system and is limited to the following:

- Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and / or the prevention of terrorism and disorder
- Prosecution agencies
- Oxford University Proctors or Oxford University Security Services
- An authorised member of College or College staff in the course of an investigation under the Health and Safety at Work Act or of student or staff discipline.



If the College cannot comply with the request, the reasons will be documented. The requester will be advised of these in writing, where possible.

### **Retention and disposal**

Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than 30 days from the date of recording.

Images are securely stored and access is restricted to authorised personnel only.

### **Complaints regarding operation of system**

Complaints regarding the CCTV system and its operation must be made in writing to the Principal Bursar, St John's College, OX1 3JP.

This policy was adopted by Governing Body on 23<sup>rd</sup> May 2018.

## **POLICY HISTORY**

| <i><b>Date of GB approval</b></i> | <i><b>Brief summary of changes</b></i>   | <i><b>Confirmation that linked documents have updated if necessary</b></i> | <i><b>Date College policy register updated</b></i> |
|-----------------------------------|--|--|--|
| May 2018                          | First draft of policy reviewed by GB   | Confirmed  | Yes (Sandra Campbell)                              |
| Jan 2019                          | Policy reviewed by Committee and subsequently approved by GB.  | Confirmed  | Yes (Sandra Campbell)                              |
| Jan 2020                          | Responsibility for operation changed from Lodge Manager to Home Bursar. Policy reviewed and subsequently approved by GB. | Confirmed  | Yes (Kate Doornik)                                 |
| Jan 2021                          | Responsibility for operation changed from Lodge Manager to Home Bursar. Policy reviewed and subsequently approved by GB. | Confirmed  | Yes (Sandra Campbell)                              |
| Jan 2023                          | Updated responsible College officers; sports ground CCTV moved to  | Confirmed  | Yes (Neil Tindall)                                 |



|               |  |           |                    |
|---------------|--|-----------|--------------------|
|               | main college system and ownership transferred from Works Bursar to Domestic Bursar |           |                    |
| Jan 2024      | Nursery and Hart Synnot House added  | Confirmed | Yes (Neil Tindall) |
| February 2025 | Reviewed by Domestic and Establishment Committee                                   | Confirmed | Yes (Neil Tindall) |