

Data Protection Guidance Sheet 1: CCTV and Recording Equipment

The Data Protection Act 1998 requires that we handle all data, including information held in recorded format in accordance with the Data Protection Principles. To ensure that we comply with the Act the following guidelines¹ should be applied: -

- Cameras should be positioned to ensure that the images we collect are relevant to the purpose for which we are collecting them.
- Individuals need to be informed that their image may be captured on camera – we need to display posters at points of access, and near cameras in some circumstances, which clearly show: -
 - University of Wolverhampton logo (to make it clear who owns the data)
 - The purpose for which we are collecting the data, usually detection and prevention of crime (if other purpose inform University Secretary so that it can be included in the University’s notification to the Information Commissioner)
 - Contact details (telephone number) so that individuals can make enquiries about the scheme
 - An image of a CCTV camera for inclusion purposes
- Posters should be clear and if at eye-level at least A4 size, and A3 size at the entrance of car parks or where positioned at another level.
- Recordings should be clear enough to ensure that individuals are recognisable
- Where media for recording is to be re-used, data should be erased before new recordings are made
- Recordings should not be kept for longer than the specified time unless they are required for a specific investigation
- The recordings should be stored securely to prevent unauthorised access or accidental damage
- The images should not be used for any purposes other than those specified
- Equipment should be monitored to ensure that images are of a consistent standard allowing for the recognition of individuals
- Where access is authorised to third parties an audit trail should be kept showing who has had access to the data and the reasons why access was given
- All staff with access to the recordings should undergo data protection training



¹ <http://www.informationcommissioner.gov.uk/cms/DocumentUploads/cctvcop1.pdf>

Procedures should state: -

- How long the information should be retained (determined by length of time in which an incident could take to come to light)
- Procedures for confidentially disposing of recording media no longer required i.e. ensuring tapes are erased before disposal
- Management Responsibility
- Staff who will be authorised to access the recordings for routine purposes, in addition to those who would require access to investigate incidents
- Monitoring procedures, including quality of recordings
- How long recording media will be used before being replaced
- How media will be erased before new recordings are made
- Security of media containing data
- Criteria for third party access to data e.g. completion of s. 29(3) form
- Logging access to third party data, recording: -
 - Individual/organisation to whom data has been disclosed
 - Date
 - Reasons
 - When recording was returned
- How rights of data subjects will be addressed e.g. right to access data, right to object to processing

Webcams

Notices should be displayed where webcams are in operation. If the cameras capture images in public areas, where it would be difficult to get consent for their transmission, then cameras should be zoomed out so that individuals cannot be recognised.

For further information or advice contact

Information and Records Manager

01902 322444

Information is also available on the Information Commissioner's website

www.informationcommissioner.gov.uk

