

## Closed Circuit Television (CCTV) Policy

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<b>Security classification</b>	Official

### Key messages

The main objective of this policy is to:

- Inform ICO staff and users of ICO premises of the arrangements for the placement and management of CCTV in ICO offices.
- Provide information about the retention of CCTV images where the ICO has responsibility for the systems in use.

### Does this policy relate to me?

The policy relates to all staff and users of ICO premises.

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## 1. Introduction

- 1.1. The Information Commissioner's Office uses CCTV for the purposes of the prevention and detection of crime and in order to recognise and identify individuals with a view to taking appropriate action where necessary.
- 1.2. This document sets out the accepted use and management of CCTV equipment and images to ensure that the ICO complies with the Data Protection Act 2018 and other relevant legislation. We process personal data in line with our [Data Protection Policy](#).
- 1.3. The ICO will also be cognisant of the Guiding Principles of the Surveillance Camera Code of Practice as published by the Home Office and updated in 2021.
- 1.4 This policy and procedure applies to all ICO sites.

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## 2. Policy position and purpose

- 2.1 CCTV has been installed in our server rooms to assist in deterring crime, and also the prevention and detection of crime. The system

is also intended to assist with the identification, apprehension and prosecution of offenders, and the identification of actions that might result in disciplinary action.

- 2.2 The existence and position of CCTV will help to deter any unauthorised access to server rooms and, in the event of an incident, help to identify individuals involved.
- 2.3 The purpose of this policy is to establish what CCTV the ICO will use, how it will be used and managed.

### 3. Responsibility for the management of the system

- 3.1. The Estates and Facilities Department has overall responsibility for the maintenance of the system. They will periodically check the equipment and arrange for the suppliers to carry out periodic maintenance checks.
- 3.2 The Facilities Team will ensure that images are deleted in accordance with the retention policy. Members of the Facilities Team and ADT will have access to the recorded images during the maintenance of the systems but will under no circumstances routinely view, disclose or retain copies of the recorded images.
- 3.3 Members of the Facilities and Estates department will be trained in the operation of the CCTV system, and will be aware of the data protection compliance requirements in line with the Code of Practice.

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### 4. Auditing the system's operation and working practices

- 4.1 The Information Management and Compliance Department is responsible for ensuring that this policy and its implementation is compliant with Data Protection Legislation, and will audit the system's use on a periodic basis.
- 4.2 The Information Access Team is responsible for dealing with and responding to any requests for access to images made by

individuals under the Data Protection Act 2018. Any requests received into the ICO for access to images must be forwarded to the Information Access team to be progressed using existing procedures.

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## 5. Access to and disclosure of images

- 5.1 The Head of Facilities and Estates, or delegated managers within their department, is responsible for viewing images when investigating an incident or suspected incident.
- 5.2 Images may also be accessed by the relevant Investigating Manager if necessary as part of a disciplinary investigation. Images may then be disclosed as part of the evidence assembled by the Investigating Manager in the event of a disciplinary hearing.

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## 6. Secure storage and retention of images

- 6.1 Images will be stored on the recording equipment which will be securely protected. The Facilities Team have responsibility for ensuring that the equipment and the routinely recorded images have the necessary security. Images are routinely retained for one month, but may be retained longer in the event that they are required as part of an investigation.
- 6.2 Where images have been retained for an investigation the Facilities and Estates department will take responsibility for the secure storage of those images. This will be done in liaison with an appointed Investigating Manager where necessary for disciplinary purposes.

## Feedback on this document

If you have any feedback on this document, please [click this link](#) to provide it.

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## Version history

Version	Changes made	Date	Made by
2.0	Review of existing policy and content placed in new policy template	August 2023	Mike Collins

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## Appendix – siting of cameras

### Wilmslow

- 2 x CCTV cameras in Sever Room in Wycliff House
- 1 x CCTV camera pointed at Entrance C in Wycliffe House (non-recording)
- 1 x CCTV camera pointed at the Car Park Barrier (non-recording)
- 1 x external CCTV camera pointing at Entrance B from the car park (non-recording).

### Belfast (new office)

- 1 X CCTV camera in lift lobby area (non-recording)

### Cardiff

- There are no ICO controlled CCTV cameras at this site

### Edinburgh

- There are no ICO controlled CCTV cameras at this site

### London

- There are no ICO controlled CCTV cameras at this site

It should be noted that the ICO offices are based at sites where building landlords may operate their own CCTV systems for the purposes of security and crime prevention/detection.

The presence of CCTV cameras outside the ICO's office should be made clear to building users, and form part of the considerations in the Data Protection Impact Assessment when the ICO is seeking new building leases.