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EFM Integrated Management  
System

# Operational Procedure

## The University of Sheffield CCTV and Body Worn cameras (BWC) Privacy Impact Assessment

IMS Procedure: OPP\_SE008

Issue number: 1 Version: 6

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Date of issue: March 2021

### The University of Sheffield CCTV and Body worn cameras (BWC) Privacy Impact Assessment

#### 1. INTRODUCTION

1.1 This Privacy Impact Assessment (PIA) CCTV and BWC is recommended in The Surveillance Camera Code of Practice, issued by the Surveillance Camera Commissioner in June 2013 in accordance with Section 30 (1) (a) of The Protection of Freedom Act 2012. The purpose of the PIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met whenever possible.

1.2 The purpose of this Privacy Impact Assessment is to ensure compliance with the Surveillance Camera Code of Practice Principle 2 - The use of a surveillance camera system and BWC must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.

1.3 Principle 2 identifies ‘the need for a privacy impact assessment process to be undertaken whenever the development or review of a surveillance camera system and/or a BWC is being considered to ensure that the purpose of the system is and remains justifiable, there is consultation with those most likely to be affected, and the impact on their privacy is assessed and any appropriate safeguards can be put in place. Where such an assessment follows a formal and documented process, such processes help to ensure that sound decisions are reached on implementation and on any necessary measures to safeguard against disproportionate interference with privacy. In the case of a public authority, this also demonstrates that both the necessity and extent of any interference with Article 8 rights has been considered.’

1.4 A privacy impact assessment also helps assure compliance with obligations under the Human Rights Act 1998 which specifies that;

- (1) Everyone has the right to respect for his private and family life, his home and his correspondence.
- (2) There shall be no interference by a public authority with the exercise of this right except such as in accordance with the law and as is necessary in a democratic society in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

1.5 ‘Personal data’ as defined by Section of the Data Protection Act means data which relates to a living individual who can be identified:

- (a) From those data, or
- (b) From those data and other information which is in the possession of, or is likely to come into the possession of, the data controller.

## **2. STORAGE AND MANAGEMENT OF CCTV and BWC RECORDED DATA**

2.1 The University of Sheffield CCTV Control Room operates a Code of Practice which ensures compliance with relevant legislation in relation to the management and operation of public space CCTV. The University owns and operates a CCTV surveillance system which was first installed in 1998 and has been upgraded at various times and as of January 2020 operates 1046 cameras. In 2020 all footage will be recorded to digital media which has made information storage and searching much more flexible.

2.2 The CCTV Control Room is staffed 24 hours a day, 365 days a year. All CCTV operational staff are trained. Supervisors and Management also have also undertaken training, to

ensure the appropriate level of knowledge of legislation to ensure compliance with legislation for CCTV evidence data recording, monitoring, viewing and retrieval.

2.2 CCTV digital recordings from cameras are only accessible from the CCTV Control Room, which has air locked, video access control. CCTV recording equipment is contained within an additional secure storage area within the CCTV Control Room. Access to this area is for authorised personnel by appointment only and all callers are authenticated prior to entry and required to sign in and out of the premises.

2.4 The control room system is supported by digital recording facilities, which will function throughout operations at 7 frames per second. In addition incidents can be recorded in 'real time' where necessary at 25 frames per second. Digital images will be automatically erased after a set period, which will be no longer than 7 days with the exception of cameras in licensed commercial premises which will be held for a period of 31 days. Recorded images will only be retained for longer than 31 days if a request is made under the Data Protection Act, Freedom of Information Act, the Police and Criminal Evidence Act 1984 or the Criminal Procedures and Investigations Act 1996

2.5 The system is supported by an Uninterrupted Power Supply (UPS) and generator these are programmed to maintain a power supply to essential equipment in the event of total power failure.

2.6 The use of body worn video is lawful, Data will be processed and managed in line with the University Codes of Practice. The normal use of body worn video will be overt. The operational use of body worn video must be proportionate, legitimate and necessary. Use of body worn video will be incident specific. Officers will use common sense and sound judgement when using body worn video, in support of the principles of best evidence.

2.7 All BWC recorded footage will be uploaded to the Security Supervisors I.T. system by the on duty Supervisor only. The Supervisor on duty will ensure that any footage to be retained has been correctly bookmarked and that supporting Incident Reports have been completed. For Incidents where the Police have not been in attendance the Supervisor will review the recording and a decision will be made on whether referral to the Police is appropriate.

2.8 The Supervisor will then transfer the data to the IT system hard drive and complete the Information Asset Log. All retained data will be kept until all investigations have been completed or a prosecution has taken place. Any other data not required for evidential purposes will be deleted after 7 days. Where the images might be required for a civil matter, for example a health and safety enquiry that is not a criminal investigation, they should be retained in accordance with the rules of retaining information. The University, as a public authority has a duty to retain any information that might form part of an investigation, even civil ones.

### 3 RESPONSIBLE PERSON CONTACT DETAILS

Below are the contact details of the person most qualified to respond to questions regarding this Privacy Impact Assessment.

Title: University Head of Security  
 Organisation: The University of Sheffield  
 Email: r.yates@sheffield.ac.uk  
 Telephone: 0114 222 9232

### 4 CAMERA SPECIFIC - PRIOR TO INSTALLATION

#### TOWN CENTRE CAMERAS

<b>1</b>	<b>Why is a camera(s) being considered for installation?</b>	Cameras installed pre-2012 and the use of BWC for crime and disorder purposes and in line with Scheme objectives.			
<b>2.</b>	<b>Has there been consultation before the camera(s) were installed?</b>	<b>Yes</b>	x	<b>No</b>	
<b>2b</b>	<b>If yes, what was the outcome of the consultation?</b>	Records are not available of each project consultation prior to the installation of all cameras.			
<b>2a</b>	<b>If no, why wasn't it undertaken?</b>	Not available			

### 5 CAMERA SPECIFIC – PRIOR TO INSTALLATION & REVIEW

#### TOWN CENTRE CAMERAS

3	<b>What type of camera(s) are being considered or in place?</b>	Cameras have been installed throughout the main campus and the residences. Some of the cameras are fully operational with pan, tilt and zoom (PTZ) facilities, others are fixed. The security team also on occasion operate with BWC			
4	<b>Is audio recording an available feature of this camera?</b>	Yes	X	No	
4a	<b>If yes; What measures are in place to protect private dialogue?</b>	Our BWC have a sound facility, the control measures for making the public aware are contained in our operational procedures and known to all security staff. As such the University will ensure that the use of Body worn CCTV is emphasized by Patrol Officers wearing it in a prominent position (normally on their chest) and that its forward facing display is visible to anyone being recorded. Additionally, Patrol Officers will make a verbal announcement, where practicable, prior to commencement of any recording.			
5	<b>Does this camera(s) have any other camera specific or software related features such as Automatic Number Plate Recognition, Facial Recognition, movement analysis?</b>	Yes		No	x
5a	<b>If yes; What software/function?</b>	n/a			
5b	<b>What is the purpose of having/installing this function or</b>	n/a			
5c	<b>What measures are in place to protect privacy when using this function/software?</b>	n/a			
6	<b>Do the cameras have the capacity to record personal information as defined in para 1.5?</b>	Yes	x	No	

<p><b>6a</b></p>	<p><b>If yes, please explain what and why?</b></p>	<p>Our CCTV system which includes BWC's is used to create a safer environment for staff, students and visitors to the University of Sheffield. The cameras have the ability to capture a range of images providing varying amounts of detail. When used to full potential and zoomed in they are able to capture identifiable images of an individual. Cameras are only used by trained operatives and the range of features available from a camera are utilised by an Operator when patrolling a camera or responding to an incident. An Operator may zoom in to capture an identifiable image of an individual. This would be to assess whether behaviour is suspicious, to identify if they are the suspect or victim of a crime or whether they match an identity as described in the case of a missing person for example. Any actions taken or information released will be in all cases carried out in accordance with the Data Protection Act 1998, The Police and Criminal Evidence Act 1984 or The Criminal Procedures and Investigations Act 1996</p>			
<p><b>7</b></p>	<p><b>Is there any chance of this footage being released in the public domain?</b></p>	<p><b>Yes</b></p>	<p>x</p>	<p><b>No</b></p>	
<p><b>7a</b></p>	<p><b>If yes, explain why and what are the controls in place?</b></p>	<p>Images from the University of Sheffield CCTV system and from BWC's could be released into the public domain if it is in the public interest. Such as the identification of a suspect involved in crime, Public Safety, National Security or for example in the case of missing persons. In all cases this would be carried out in accordance with article 8 of the European Charter of Human Rights (ECHR) and Data Protection (DP) principles as documented in our own codes of practice.</p>			

8	Is there a Data Protection Act compliant sign clearly displayed in close proximity of the camera(s) to make people aware that CCTV is in operation?	Yes	x	No	
9	Do the camera(s) cover any part of any property where there is an expectation of privacy?	Yes	x	No	
9a	If yes what is covered?	Residential property, Student Accommodation.			
9b	What measures have been taken to prevent observation of these areas?	All security staff have been trained in Privacy Law and will operate the system in a manner, which is consistent with respect for the individual's privacy			
10	Does any additional action need to be taken to reduce the impact on privacy by this camera?	Yes		No	X

**6 CAMERA SPECIFIC – POST INSTALLATION**

**TOWN CENTRE CAMERAS**

1	Has the purpose of the camera(S) been reviewed?	Yes	x	No	
		<b>Date:</b>			
1a	What was the outcome of the Review?	The cameras including are still regularly used to respond to crime and disorder incidents and monitor hot spot locations. The cameras are still used and productive for the reasons they were installed. Cameras in Town Centre locations have been determined to have a low privacy expectation			
2	Has the Council ever received a complaint relating to the impact on privacy by any camera?	Yes		No	

2a	Please give details of the source and nature of the complaint and the outcome.	<u>n/a</u>
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Any further action to be taken	Responsibility of	By When	Status	Completed Date
<p>As major University building projects develop the University understands that using CCTV can be privacy intrusive, because it is capable of putting law-abiding people under surveillance and recording their movements as they go about their day to day lawful activities. Careful consideration we be used whether to use it, or not; the fact that it is possible, affordable and has public support should not be the primary motivating factor. The University will take into account what benefits can be gained, whether better solutions exist, and what effect it may have on individuals. We will continue to monitor the use and effectiveness of BWC as part of the annual reporting process.</p>	Head of security		On-going	

Date of next review: March 2022

**Richard Yates**  
**Head of Security The**  
**University of Sheffield**