

## **Guild of Students' CCTV Policy**

The Guild of Students must ensure all CCTV policies and procedures comply with the EU General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA). CCTV images can be personal data and are covered by these laws. The Guild will also comply with its Privacy Policy in operating CCTV in the Guild.

It is essential therefore, that:

- Those capturing images of individuals comply with the GDPR and DPA and the Guild's Privacy Policy;
- Captured images are usable; and
- Those whose images are captured are reassured.

Failure to comply with Data Protection requirements will also affect the police's ability to use the CCTV images to investigate a crime and may hamper the prosecution of offenders.

### **Administration**

The Guild as Data Controller is responsible for the overall control of the footage and recorded images as part of the Guild's Data Protection Policy. Managers responsible for the day to day operation of the CCTV system include:

- Venues Management
- Facilities Management

### **Disclosure**

The Guild's CCTV system is primarily established to prevent and detect crime. Therefore, the Guild's CCTV images and footage will be disclosed to law enforcement agencies where a crime needs to be investigated.

Judgments relating to the disclosure of images, to those other than law enforcement agencies, are made by the Guild of Students Data Protection Officer or CEO. The Guild retains the right to refuse any request for information unless there is an overriding legal obligation.

The Guild will also use CCTV footage as necessary in the investigation of complaints and potential disciplinary investigations, subject to the approval of the Data Protection Officer/CEO.

### **Retention**

Guild CCTV footage is retained automatically for one calendar month unless a request is made for longer retention with good reason, for example because a crime or complaint is still being investigated, and the DPO and/or CEO agree to such request. If this is the case it will have to be saved to a disc and this will be completed by the Facilities or Venue Management and stored securely.

### **Subject Access Requests**

Subject Access Requests should be made to the Guild of Students HR & Administration Manager/Data Protection Officer directly and will be responded to within 1 month. Once a request is made, efforts will be made to identify and retain any relevant images beyond the usual calendar month so that they can be disclosed if required, even if it takes up to 1 month to respond to the subject access request.

**Communication**

Adequate signage is displayed throughout the building, to ensure Guild's members and customers are aware that CCTV systems are in operation throughout the Guild building.

**Review**

The Guild conducts annual reviews to help to ensure that the CCTV system remains compliant with the requirements of the Act and that the system is working properly and producing high quality images.

**Further Information**

For further information about your rights in relation to CCTV at the Guild, including how to raise any concerns you may have, please see the Guild of Students Privacy Policy, which can be found here <https://www.guildofstudents.com/privacy-policy/>