Version Control

Document title

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/282774/SurveillanceCameraCodePractice.pdf
8. Information Commissioner's Office, *The employment practices code,* Accessed online at: https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf

3. Legal Framework

3.1 This policy sets out how GBS will handle the personal data of our staff, clients, suppliers, partners, employees and other third parties. The legal framework that governs this policy is founded on the following acts: The Data Protection Act (DPA) 2018, The United Kingdom General Data Protection Regulation (UK GDPR) which regulates how personal data can be processed and protected. Data Protection law ensures that CCTV cameras are used only where and when it is necessary, which is arguably one of the most fundamental elements of legal compliance. The DPA explicitly states that personal data "shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed."[1]

3.2 The Information Commissioner's Office (ICO) is a government body and provides a compilation of practical advice about how to ensure GBS is following data protection guidelines. The ICO issues data protection code of practices for surveillance cameras and personal information which has been crucial in compiling this policy.

3.3 Section 40 of the Freedom of Information Act (FOI) 2000 contains a two-part exemption relating to information about individuals and regulates access to information held by public authorities. The Protection of Freedoms Act (POFA) 2012 regulates (among others) how surveillance and biometric data can be used, and how these types of data must be safeguarded. The Human Rights Act (HRA) 1998 includes provisions regarding the right to privacy.

3.4 The Surveillance Camera Commissioner's Office (SCCO) also issued a Code of Practice, aiming not only to detail the legal requirements that CCTV users are bound by, but also to provide a coherent technical framework for planning the deployment of CCTV cameras and for integrating them in our security system. (*Please refer to APPENDIX C - The Surveillance* 8 0 0 uerasstomm(is)(st)-(nge)-3)r-9(C)]e boof

website. GBS as a Data Controller shall implement appropriate technical and organisational measures to ensure that processing of personal information alongside CCTV is performed in accordance with the UK GDPR and DPA (2018). GBS as a data controller of a CCTV system has the following responsibilities:

To ensure that surveillance camera systems are used only where and when it is necessary.

they understand and observe the legal requirements related to the processing of relevant data. Any misuse, or wrongful processing, of the relevant data could result in disciplinary action.

GBS Data Protection Officer**:** DPO is responsible for advising GBS on its obligations, monitoring compliance, assisting with Data Protection Impact Assessments (DPIAs) and liaising with the Information Commissioner's Office. The DPO is also responsible for ensuring that GBS processes the personal information of its staff, students, customers, providers, and partners in compliance with the applicable data protection rules. Any issues related to Data Protection and compliance issues, please contact dpa@globalbanking.ac.uk.

GBS Head of Facilities, GBS Human Resources: Responsible for implementation, monitoring and review of this policy and ensuring that training, guidance, and advice regarding data protection compliance is made available to staff.

GBS Line Managers**:** Responsible for ensuring that requests made under data subject rights are reviewed and where appropriate referred to Human Resources promptly and ensuring that suspected or actual compromises of personal data are reported immediately.

All GBS Members (staff and students)- All members of staff and students are advised to familiarise themselves with this policy and the appropriate GBS Privacy Policy and GBS Data Protection Policy. Any issues related to Data Protection and compliance issues, please contact dpa@globalbanking.ac.uk.

5. Control Room Access

5.1 CCTV cameras will be monitored by a CCTV control-room which is based at GBS Greenford campus, 891 Greenford Road, Greenford, West London, UB6 0HE.

5.2 GBS CCTV cameras are in various areas around the campus positioned both internally and externally in all locations where GBS operates including GBS London (Republic, Stratford, Bow and Greenford campus), GBS Birmingham, GBS Leeds and GBS Manchester campuses. These will monitor our academic buildings (including individual and open plan offices), libraries, classrooms, computer

laboratories, student and staff social/communal areas, security rooms, reception areas, and car parks etc.

5.3 Access to recorded images will be restricted to those staff authorised to view them

Close to each internal camera.

7.3 Please refer to APPENDIX D for CCTV Signage.

8. Covert Monitoring

8.1 GBS will inform data subjects on the sound legal basis that CCTV monitoring is being conducted through policies, privacy notices and signage unless, in exceptional circumstances for the prevention or detection of criminal activity or equivalent malpractice and any of the below from the ICO's guidance.

8.2

9.2 As a data controller, GBS needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a

9.5 When images are removed for use in legal proceedings the following information must be logged:

Date on which images were removed.

The reason why they were removed.

Any relevant crime incident number.

The location of the images.

Signature of the collecting police officer (if appropriate).

12. Staff Training and Audit

12.1 This policy may be amended by GBS at *any time*. GBS will ensure that those staff responsible for monitoring CCTV footage receive appropriate training to enable them to comply with this policy and Data Protection Law. Data Protection training is mandatory. Individuals whose roles require regular access to personal data, or who are responsible for implementing this policy or responding to subject access

APPENDIX A

Glossary

CCTV (Closed Circuit Television): means fixed position, domed, pan, tilt and zoom (PTZ) cameras at both internal and external locations designed to capture and record images of individuals and property.

Data: is information, which is stored electronically, or in certain paper-based fili

CCTV as well as automatic number plate recognition (ANPR), body worn cameras, and any other systems that capture information of identifiable individuals or information relating to identifiable individuals.

United Kingdom General Data Protection Regulation (UK GDPR): The United Kingdom General Data Protection Regulation ((EU) 2016/679). Personal Data is subject to the legal safeguards specified in the GDPR.

APPENDIX B

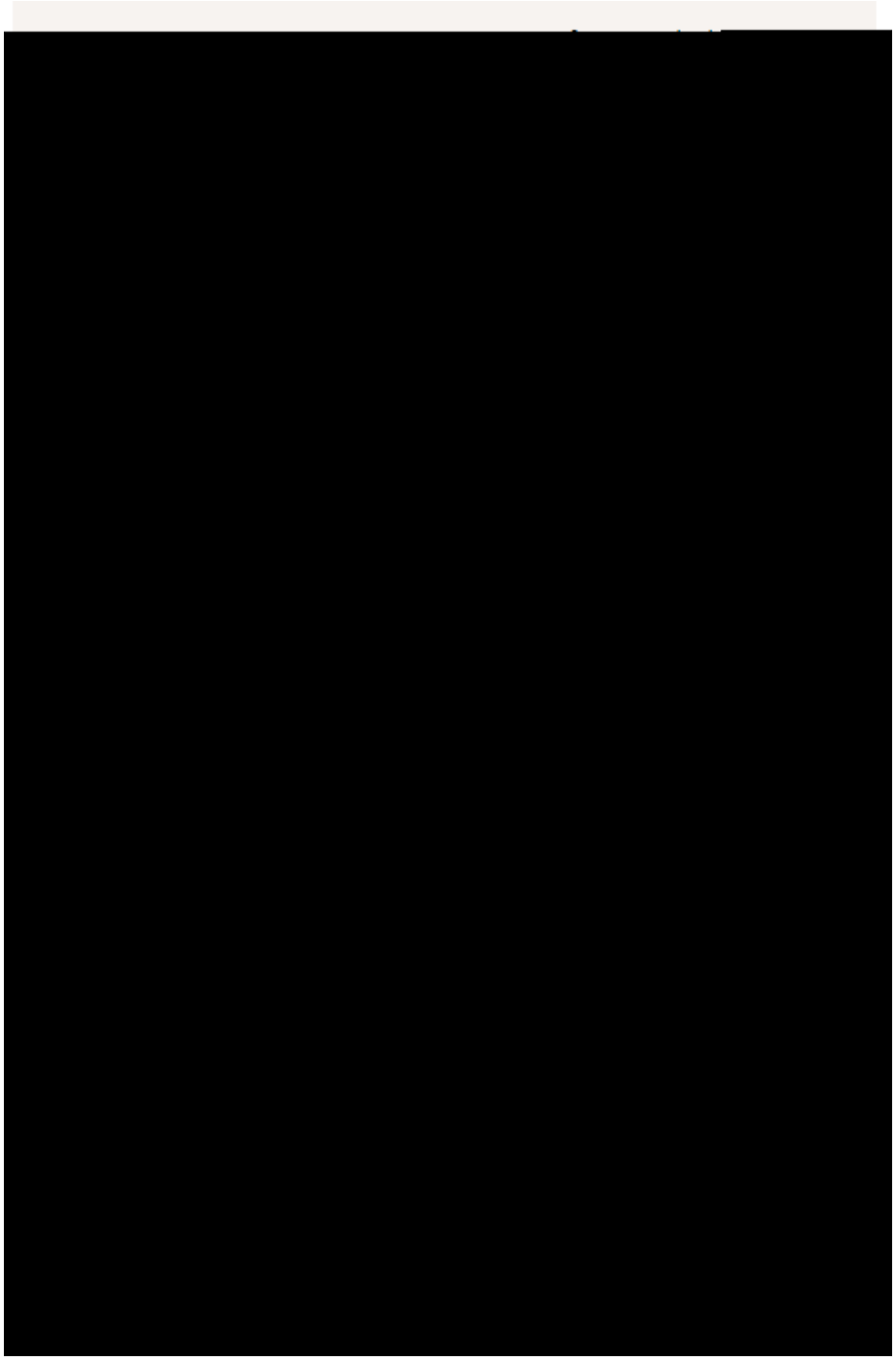
Principles relating to the processing of Personal Data under Data Protection Act 2018 and UK GDPR

Personal data shall be:

a) Processed lawfully, fairly and in a transparent manner in relation to the Data Subject.
b) Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
c) Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
d) Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased, or rectified without delay.
e) Kept in a form which permits identification of Data Subjects for no longer than is necessary for the purposes for which the personal data are processed; and
f) Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction, or damage, using appropriate technical or organisational measures.

APPENDIX E

Example of a Subject Access Request



Please note, the above subject access request example was obtained from the ICO website.

APPENDIX F

GBS Staff Complaint