

## Regulations concerning camera surveillance at the University of Groningen

The Board of the University of Groningen,

- Bearing in mind the need to have a clear University-wide policy regarding camera surveillance
- In line with Article 9.23.e of the Higher Education and Research Act (WHW), whereby the Board of the University must gain the advance approval of the University Council regarding the drawing up of regulations in the area of working conditions, which includes camera surveillance

Has determined the following:

### Article 1 Aims of camera surveillance

The aims of camera surveillance are to:

- a. safeguard the health and safety of staff, students and visitors of the University of Groningen (henceforth 'the University')
- b. secure the entrances to premises and grounds
- c. protect property in the premises and on the grounds
- d. record incidents

### Article 2 Scope

These regulations govern all surveillance cameras.

Cameras used to record lectures do not fall under the scope of these regulations.

### Article 3 Definitions

The following definitions apply to these regulations:

**Footage:** images obtained through camera surveillance.

**Manager:** the University staff member who is responsible for camera surveillance.

**Authorized staff:** people appointed by the Board of the University who are involved in implementing camera surveillance.

**Camera surveillance:** the generation of images of one or more people, through the use of clearly visible cameras, whereby the responsible party has clearly informed the student, staff or visitor of the possibility of camera surveillance in generally accessible areas in University premises, with the exclusion of work stations.

**Escalation officer:** a person appointed by the Board of the University who is responsible for any escalation involving the police and for securing the footage in the event of observable incidents.

**Incident:** a situation that appears to be illegal or other reprehensible behaviour.

**Server space:** the space where the server registering the recorded camera footage is located

**Responsible party:** the Board of the University, which determines the aim of and the means for processing personal data.

#### Article 4 Tasks and responsibilities

- The Board of the University (henceforth 'CvB') is responsible for processing personal data within the University under the terms of the Personal Data Protection Act [*Wet Bescherming Persoonsgegevens*].
- The Director of the University Services Department is responsible for camera surveillance on behalf of the CvB and has delegated this task to the Manager.
- The Manager in question is the Facilities Manager. In his/her absence, the next person in the hierarchy will assume responsibility. The Manager will take decisions about the location of the cameras, mandated to this end by the Director of the University Services Department, and will be advised to this end by the authorized staff.
- Two authorized staff members per faculty/service unit will have access to the footage and be responsible for assessing any new requests for camera surveillance in their buildings. These staff members will be appointed by the Manager.
- The authorized staff and the Manager are authorized to operate the equipment used for camera surveillance and for watching the footage. They must treat this footage as confidential, in accordance with the provisions of Article 1.16 of the Collective Labour Agreement for Dutch Universities (CAO NU).

#### Article 5 Security

The Manager will ensure suitable technological and organizational measures are in place to secure personal data against loss and to prevent any form of illegal processing of personal data whatsoever.

#### Article 6 Hidden camera surveillance

- In exceptional circumstances, hidden cameras may be temporarily placed in University premises for the protection and security of people and property in the event of suspicions of a criminal offence or other reprehensible behaviour on the work floor. The installation of hidden surveillance cameras is only permitted with due observance of the statutory framework.
- A hidden camera may only be installed with the permission of the Board of the University.
- The Manager may submit a proposal for the installation of a hidden camera, after consultation with the Director of the University Services Department and the board of the relevant service unit or the Faculty Board.

#### Article 7 Access to the camera surveillance system

Only people appointed by the Manager who need access to data to perform their duties will be granted direct access to personal data.

#### Article 8 Specific use

- The only data that will be processed will be:
  - a. footage of the premises and grounds that fall under the responsibility of the responsible party, and any people and property in or on them
  - b. data regarding the time, date and place the recordings were made.
- Footage will be stored for a maximum of 4 weeks, in line with the Exemption Decree Personal Data Protection Act [*Vrijstellingsbesluit Wbp*]. The footage will be deleted automatically after 4 weeks.
- Notwithstanding the above, any footage relating to an actual incident may be retained until the investigation into said incident has been completed.

- Camera surveillance will be made known by signs and/or stickers stating that camera surveillance is in place as well as by publication of these Regulations on the University of Groningen website.

#### Article 9 Documentation

- A daily logbook will be kept of the camera system readouts.
- The logbook is confidential.
- The logbook will record the name of the Manager on duty, date, time and any unusual events, such as faults, incidents, reports, requests for footage, etc.
- When not in use, the logbook will be stored in a locked cupboard.
- In the event of an incident, the security service will report any unusual circumstances to the Manager, and the reports will also be saved in a digitally secure environment.
- The Manager will in turn report to the responsible party. In the case of incidents that are reported to the police, the Manager will immediately report to the responsible party.
- If surveillance footage is reviewed or retained as part of an investigation, this must always be recorded in the daily logbook. The security service will submit a quarterly incident report to the Manager, so that he/she can consult with the authorized staff from the unit concerned and take preventive measures or install extra cameras where necessary.

#### Article 10 Rights of individuals involved

- In principle, anyone who appears in the footage has the right to view the footage. They must submit any request to do so to the Manager by letter or e-mail. The Manager will reply within 10 working days and either grant permission or give reasons for denying it. Footage will always be viewed in the presence of an escalation officer from the Main Control Room.
- Complaints relating to the use of the camera surveillance system and/or the actions of the Manager or authorized staff must be submitted in writing to the Board of the University.
- The Board of the University will respond in writing within 6 weeks of receiving a complaint.

#### Article 11 Access to the footage

- The Manager may release personal data to the police or to the public prosecutor if it is related to the investigation of criminal offences.
- Granting access to footage to third parties other than the police or the public prosecutor will only occur if this is compatible with the goal of the camera surveillance and only in accordance with the provisions of the Personal Data Protection Act.
- Any requests to this end must be submitted in writing to the Board of the University.
- After assessing all the interests involved, the Board of the University will make a decision on the request as soon as possible.
- Footage will always be viewed in the presence of the Manager or the escalation officer.
- The requester must identify him or herself to the Manager.
- Everyone who is granted permission to view footage must sign a viewing declaration.

#### Article 12 Official Title

These Regulations may be cited as 'University of Groningen Regulations Concerning Camera Surveillance'.

Article 13 Date of Commencement

These Regulations will come into effect on the day of publication, and with retrospective effect from 1 January 2015.

As decreed on 13 July 2015 in a meeting of the Board of the University, after approval by the University Council.

The Board of the University of Groningen.