

CPNI

Centre for the Protection
of National Infrastructure



Storage of Recorded CCTV Images

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Storage and Retention of Recorded CCTV Images

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Aim

The aim of this note is to provide guidance which will assist organisations in establishing how long they should store recorded CCTV images. This document should be used for guidance only. Some sectors have their own regulatory bodies and this document does not aim to contradict mandated regulations. For complete information see the Camera Commissioner's Code of Practice.

Background

Many organisations deploy CCTV for security surveillance. They record the imagery and store it for a variable length of time. CPNI have concluded that there are a lot of misconceptions and misunderstandings about what imagery can/should be recorded and how long those recordings should be kept. There is a misconception that the Home Office states that 30 days is mandatory – **this is not, in fact, the case**. It is often thought that an organisation can make an arbitrary 'finger in the wind' type decision on how long they hold images. This decision, for some organisations, can be based on a number of things, not least the cost of storage. To a certain extent it is true that an organisation can (and should) make its own mind up about how long images are kept... **but** this decision needs to be qualified and documented and based on evidence not hearsay or "because that's how it's always been done". The recent adoption in the UK of GDPR (General Data Protection Regulations) means that we all have a duty to protect people's personal information, this includes storing their images.

What should we be recording?

The principals of siting/using a surveillance camera (which in essence a security camera is) are centred around the use of cameras in a responsible way. Each and every camera should have a stated and documented purpose. That purpose will be identified through the Operational Requirement (OR) process. It should be understood why the camera is there, what it is looking at and why and what will be done with the recorded images. The *Surveillance Camera Code of Practice* sets out quite clearly the 12 guiding principles behind the use of CCTV. There will be data protections considerations in siting every camera, a Data Protection Impact Assessment (DPIA) may be required for every camera.

There is a belief in the security world that CCTV imagery should be stored for a mandated period (typically 30 days). However, **there is no set time for holding CCTV recorded imagery**¹. The *Surveillance Camera Code of Practice* states:

*'No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged'*².

¹ Certain sectors will have their own regulations which should be adhered to, if applicable

² *Surveillance Camera Code of Practice* guidance principal 6 refers

Obviously, each site will have a specific requirement and will be able to identify the storage period during the OR process. By following the OR, a documented trail will naturally be created. This process will mean that the site or organisation is not in breach of legislation or the code of practice. It will also ensure that a site is not unnecessarily spending money on storage that is not required

Using Stored Imagery

Stored CCTV imagery must be treated in confidence. Everyone has a right to privacy (even in the workplace). Some of your recorded imagery may be of the general public and the vast majority of footage will be of law abiding people going about their business. We have a duty to look after this information.

'Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes'³.

Given the citation above, an organisation should still periodically review the imagery: for two reasons.

1. Firstly, it is important to ensure that the recorded imagery is of a quality that is of some use if and when it is required.
2. Secondly, it is good practice to check footage for signs of hostile reconnaissance taking place.

The person(s) responsible for the review must be a trusted member of staff and the content of the recordings must be kept in confidence.

³ *Surveillance Camera Code of Practice* (Home Office, 2013, guidance principal 7 refers)

Examples

There are a number of CCTV deployments which **may** require imagery to be stored for different lengths of time.

1. Imagine a small shop. It has two CCTV cameras operating 24 hours a day and recording the imagery. The risk to this store is from shoplifting during opening hours and break in during the closed period. It could be argued that there is no need to record more than 24 hours of footage. If the shopkeeper comes to work in the morning and there has been no break in, then the footage is no longer needed. However there may also be an argument that for evidence of shoplifting longer storage time may be needed. That is a decision to be made following consultation with the police. Suffice to say that 30 days of recorded images is not likely to be required and not in the spirit of the *Surveillance Camera Code of Practice* (Home Office, 2013).
2. A transport hub has deployed a CCTV solution in and around the site. There are a number of cameras on the outside of the building monitoring the movements of the general public. It might be appropriate given the location, threat assessment, type of transport, etc. for images to be stored for in excess of 30 days. This figure will be arrived at in the OR stage from consultation with stakeholders, including the police, perhaps. The site will document the whole consultation and decision making process as they may be challenged later. A longer period of storage might be required for post-event analysis or for proactive searches for hostile reconnaissance.
3. A government site is installing a CCTV system. They have a regulating body who mandate 90 days CCTV recording. The site **MUST** comply with the regulator and it is for the regulator to justify the reasons behind the 90 days mandatory time.

Summary

Although, generally, there are no hard and fast rules for the retention of recorded CCTV imagery it is fair to say that footage should only be stored for as long as is absolutely necessary to meet the OR. The personal data of the people in the images must be respected and current data protection regulations adhered to. Remember that your policies may change if legislation changes. All footage must be treated in confidence by trained and trusted staff and should only be used for authorised and documented purposes. When no longer required, or the declared retention period is reached, it should be deleted.



There is no set time for holding recorded images

There are certain sectors who will have the storage time mandated by governing bodies or regulators. These regulations will take precedence over all other guidance and good practice.

Further Reading

Surveillance Camera Code Of Practice and associated documents available at:

<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>

Surveillance Camera Commissioner Self-Assessment Tool available at:

<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice-self-assessment-tool>

Surveillance Camera Guidance, Tools and Templates at:

<https://www.gov.uk/government/collections/surveillance-camera-guidance-tools-and-templates>

Recommended Standards for the Surveillance Camera Industry at:

<https://www.gov.uk/guidance/recommended-standards-for-the-cctv-industry>

CCTV Operational Requirements Manual

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/378443/28_09_CCTV_OR_Manual2835.pdf