CCTV Policy

**Date:** 20/08/2021

**Next Review:** 19/08/2022

**1.** **Introduction**

1.1 Brundall Memorial Hall (“BMH”) is a registered charity, number 303916.  Closed circuit television (“CCTV”) is installed at BMH.  Cameras are located at various places on the premises and images from the cameras are recorded digitally and then automatically recorded over after approximately one month.  This document details the policy and procedures used to control the management, operation, use and confidentiality of the CCTV system.

**2. Purpose & Objectives**

2.1    The purposes and objectives of the CCTV system are:

* to maintain the security of the premises
* to deter, detect and prevent crime, vandalism and anti-social behaviour
* to provide a safe and secure environment for volunteers, staff, hirers, visitors and contractors
* to assist Law Enforcement Agencies to carry out their lawful duties.

2.2 This use of CCTV falls within the scope of The Data Protection Act 2018 and The General Data Protection Regulation 2018.  WHVH complies with the Information Commissioner’s Office (“ICO”) CCTV Code of Practice (https://ico.org.uk/media/1542/cctv-code-of-practice.pdf) to ensure that it is used responsibly.

**3. Warning Signs**

3.1 CCTV warning signs are clearly and prominently displayed at BMH’s Main Entrance Door, at the front of the Main Hall, at the side of the building in the recycling area. These signs include details of the “Data Controller” who has responsibility for the system and contact information.

**4. Siting the Cameras and Coverage**

4.1 The planning and design has endeavoured to ensure that the CCTV system gives maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

4.2 Cameras have been sited carefully so that they only capture images relevant to the purposes for which they are installed (described in “Purpose” above) and care has been taken to ensure that reasonable privacy expectations are not violated.  Every effort has been made by BMH to position cameras so that their coverage is restricted to the BMH premises which may include public areas.

4.3 The cameras are sited on

1. the corner of the building overlooking the car park entrance,
2. corner of the entrance hall overlooking main entrance door,
3. the front of the building overlooking the patio area
4. the end of the building (x2), one covering the car park and recycling bins and the other the play areas and equipment
5. the rear of the building (x2) one overlooking the hall office door and external store the other the hard standing area
6. the side of the building covering the fire exits to the hall and the parish council office door.

**5. Storage and Retention of CCTV images**

5.1 Recorded data is stored automatically for up to 4 weeks on a recorder which is secured within BMH and to which only the BMH Staff or members of the BMH Trustees have access. Recorded data will be stored in a way that ensures the security and integrity of the image and allows specific times and dates to be identified.

5.2 Normally, recorded data will not be retained for longer than 4 weeks.  On occasion, images may need to be retained longer where, for example, an incident has been identified or a Subject Access Request has been made or time is required to enable the Law Enforcement Agencies to collect relevant images, or the Law Enforcement Agencies are investigating a crime and ask for images to be preserved to afford them the opportunity to view the information as part of an active crime investigation.  All retained images will be stored securely.

**6. Access to CCTV Images and Disclosure**

6.1 Access to recorded images is restricted to members of the BMH Management Committee, all of whom are deemed by The Charity Commission to be legal Trustees of BMH, and to the BMH staff.  Disclosure of information will be controlled and consistent with the purpose(s) for which the CCTV system has been established.  Once information is disclosed to a Law Enforcement Agency, they will become data controller for the copy which they hold.

6.2 The following guidelines will be adhered to in relation to the disclosure of images:

1. The disclosure of images will be in line with the above Objectives and will be controlled under the supervision of the Data Controller or his/her deputy;
2. A log will be maintained itemising the date, time(s), camera, person copying, person receiving and reason for the disclosure;
3. The appropriate disclosure documentation from the Law Enforcement Agencies will be filed for future reference;
4. Images must not be forwarded to the media for entertainment purposes or be placed on the internet;
5. Images must not be copied in any way, eg photographed, downloaded or printed for use other than described in the objectives;
6. Images will only be released to the media for identification purposes in liaison with the Law Enforcement Agencies;
7. The method of disclosing images should be secure to ensure that they are only seen by the intended recipient; and
8. Images of third parties not relevant to the investigation should be obscured where possible to prevent unnecessary identification.

**7. Subject Access Requests**

7.1 Individuals have the right to request access to CCTV footage relating to themselves under The General Data Protection Regulation.

7.2 All requests for access should be made by e-mail or in writing to the BMH Hall Administrator these will then be passed to the Data Controller, providing sufficient information to enable the footage relating to them to be identified, ie date, time and location.  BMH will respond to requests within 4 weeks of receiving the written request.

7.3 All requests for access are recorded.  If disclosure is denied, the reason is documented and the individual will be informed within at least 4 weeks of the reason and their right to complain to a statutory authority.  BMH reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

7.4 A fee of £10 may be charged for a Subject Access Request, depending on circumstances.

**8. Complaints**

8.1 Enquiries or complaints about the operation of BMH’s CCTV system should be directed to the BMH Hall Administrator in the first instance at brundallmemorial@gmail.com or to 01603 715005.

**9. Review**

9.1 This policy will be reviewed at least annually by the BMH Management Committee or when new legislation requires this policy to be updated.