

### Offton and Willisham Village Hall - CCTV Policy

#### Introduction

As of May 2022, CCTV has been installed within the Village Hall for the purpose of safety and security. The cameras have been installed in order to provide a safe and secure environment for members of the public and to prevent loss or damage to the Hall. The Village Hall Trustees comply with the Information Commissioners Office (ICO) CCTV Code of Practice to ensure that it is used responsibly. This code of practice is published on the ICO Website. The CCTV system comprises cameras and a Digital Video Recorder covering the car park, access points to the village hall and Play Area. CCTV images will be automatically recorded on a secure, password protected control unit, and shall be automatically deleted after a certain suitable period, usually 4 weeks, unless there is a valid reason to securely hold these images for longer whilst any investigations take place. CCTV cameras are only sited so they capture images relevant to the purposes for which they are intended. Other than for routine testing purposes, real time CCTV images will not be monitored unless it is thought that an incident is happening at that time and recorded CCTV images will normally be accessed by authorised personnel only in the event of a qualifying incident or during routine system testing. Access to any recordings is limited to the Trustees, the Police, our Insurance Company loss adjustors (if required), O&WVH data Manager and his/her deputy and parties authorised by the trustees for the purposes of our security and safety only. At all times precautions will be taken to protect the rights of the people whose images have been recorded. Please note that the system does not have any sound recording capability. Individuals may apply for CCTV footage to be reviewed when a crime or incident has occurred and there is a reasonable likelihood that the event or incident was captured by the CCTV system. Any requests to access images can be made in writing to the Village Hall Committee using the Contact Details below or on our website. Any requests will be reviewed in line with this policy and full reasons will be provided if any request is declined. Notices are displayed outside of the building to inform people of the presence of the CCTV system.

With regards to the CCTV, its use and any concerns or complaints regarding the system, Offton and Willisham Village Hall Data Managers can be contacted at;

- Email - [offtonwillishamvhcctv@gmail.com](mailto:offtonwillishamvhcctv@gmail.com)
- O&WVH Data Manager - Mr Robin Derriman
- Or O&WVH Deputy Data Manager - Mr Trevor Seddon

## Introduction

Offton and Willisham Village hall (O&WVH) is a registered charity, number 289722.

Closed circuit television ("CCTV") is installed at O&WVH.

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.

## Purpose & Objectives

The purposes and objectives of the CCTV system are to:

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

This use of CCTV falls within the scope of The Data Protection Act 2018 and The General Data Protection Regulation 2018. O&WVH 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.

## Warning Signs

CCTV warning signs are clearly and prominently displayed at O&WVH's Main Entrance Door. Details of the "O&WVH data Manager and his/her deputy" who are responsibility for the system are shown on the Village Hall notice board and web site.

## Siting the Cameras and Coverage

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.

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 O&WVH to position cameras so that their coverage is restricted to the O&WVH premises which may include public areas.

The cameras are sited as follows;

- (a) above the Main Entrance (x1)
- (b) overlooking the car park (x1)
- (c) the corner of the Main Hall kitchen (x1)
- (d) one covering the area behind the building (x1)
- (e) Overlooking the Playground (x1)

### **Storage and Retention of CCTV images**

Recorded data is stored automatically for up to 4 weeks on a recorder which is secured within the O&WVH and to which only the O&WVH data Manager and members of the O&WVH Management Committee 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.

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.

### **Access to CCTV Images and Disclosure**

Access to recorded images is restricted to members of the O&WVH Management Committee, all of whom are deemed by The Charity Commission to be legal Trustees of O&WVH (of whom there is a designated O&WVH data Manager and a deputy). 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.

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

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

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i) Disclosure documentation will be stored at the O&WVH in a dedicated secure location. Access to the documentation will be restricted to the O&WVH data Manager and his/her deputy

### **Subject Access Requests**

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

All requests for access should be made by e-mail or in writing to the O&WVH data Manager or his/her deputy (see complaints/contact details below), providing sufficient information to enable the footage relating to them to be identified, ie date, time and location. O&WVH will respond to requests within 4 weeks of receiving the written request.

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

A non-returnable fee of £10 will be charged for a Subject Access Request.

### **Complaints and Contact Details**

Enquiries or complaints about the operation of O&WVH's CCTV system should be directed to;

- Email - [offtonwillishamvhcctv@gmail.com](mailto:offtonwillishamvhcctv@gmail.com)
- O&WVH Data Manager – Mr Robin Derriman
- Or O&WVH Deputy Data – Mr Trevor Seddon
- Trustees; Contact any trustee who will inform the O&WVH Data Manager or his/her Deputy

This policy will be reviewed at least annually by the O&WVH Management Committee or when new legislation requires this policy to be updated. The CCTV Notice appended to this policy forms a checklist for the O&WVH Management Committee to use and is displayed on the noticeboard in the O&WVH lobby to provide assurances on the proper use of CCTV to volunteers, staff, hirers, visitors and contractors.

# Offton & Willisham VH CCTV - Annual Trustee Review

Date.....

This CCTV system and the images produced by it are controlled by:

- O&WVH Data Manager – Mr Robin Derriman
- O&WVH Deputy Data Manager – Mr Trevor Seddon,

The above named trustees are responsible for how the system is used under the UK GDPR and Data Protection Act 2018.

We, the Trustees of the Offton and Willisham Village Hall, have considered the need for using CCTV and have decided it is necessary for the prevention and detection of crime and for protecting the safety of individuals, or the security of premises. We will not use the system for any incompatible purposes and we conduct regular reviews of our use of CCTV to ensure that it is still necessary and proportionate.

	Checked (Date)	By	Date of next review
If our system is processing footage of identifiable individuals and is processing personal data, we have registered as a controller and <a href="#">submitted a relevant data protection fee</a> to the Information Commissioner's Office (ICO). We have also recorded the next renewal date.			
There is a named individual and a deputy who are responsible for the operation of the system.			
Prior to processing we have clearly defined the problem we are trying to address. We regularly review our decision to use a surveillance system.			
We have identified and documented an appropriate <a href="#">lawful basis</a> for using the system, taking into consideration Article(s) 6, 9 and 10 of the UK GDPR and relevant Schedules of the DPA 2018.			
Our system produces clear images which we can easily disclose to authorised third parties. For example when law enforcement bodies (usually the police) require access to investigate a crime.			

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We have positioned cameras in a way to avoid any unintentional capture of private land or individuals not visiting the premises.			
There are visible signs showing that CCTV is in operation. Contact details are displayed on the Village hall notice board and web site.			
We securely store images from this system for a defined period and only a limited number of authorised individuals may have access to them.			
Our organisation knows how to respond to individuals making requests for copies of their own images, or for images to be erased or restricted. If unsure the controller knows to seek advice and <a href="#">guidance</a> from the Information Commissioner's Office (ICO) as soon as a request is made.			