

Blewbury Village Hall Executive Management Committee – Policy on the Use of CCTV

POLICY STATEMENT

Blewbury Village Hall Executive Management Committee (VHMC) operates a CCTV system to deter and reduce crime and antisocial activity in order to provide a safe and secure environment for members of the public, members of staff and contractors using the Blewbury Village Hall facilities and to prevent loss and damage to property.

The CCTV system is registered with the Information Commissioner and its use and the associated images are governed by the Data Protection Act 1998 (DPA) and the General Data Protection Regulation (GDPR).

The VHMC complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly, and safeguards both trust and confidence in its continued use. The Code of Practice is published on the ICO website.

This policy and the associated policy on privacy and data protection, outlines the VHMC use of CCTV and compliance with the DPA, GDPR and the ICO CCTV Code of Practice.

DESCRIPTION OF THE CCTV SYSTEM AND ITS PURPOSE

The CCTV system consists of a number of fixed high-definition cameras and a multi-channel control unit complete with a built-in hard drive. The system does not have sound recording capability enabled. The components of the CCTV system with data recording and storage capability are housed in a locked data cabinet and on-line access is controlled by strong passwords.

The area of coverage of the CCTV system is the exterior of Blewbury Village Hall and the Village Hall car park and the system operates 24 hrs x 7 days per week.

The purpose of the system is to deter crime and anti-social behaviour in the environs of Blewbury Village Hall. However, it is not possible to guarantee that the system will cover, or detect, every single incident within the area of coverage. There are prominent signs warning that a CCTV system is in operation placed within the controlled area.

The CCTV can be monitored centrally from a secure location in the Village Hall and remotely by approved authorised personnel as necessary. Although active 24 x 7, the system is not used for the continuous real-time monitoring of CCTV images.

The CCTV system is owned and operated by the Blewbury Village Hall Executive Management Committee and is controlled by the Chairman of the VHMC and other nominated members of the committee. All authorised operators with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are aware of the restrictions in relation to access to, and disclosure of recorded images.

OPERATION OF THE CCTV SYSTEM

1 Siting of the Cameras

- 1.1 Cameras are sited so they only capture images relevant to the purposes for which they are intended. The VHMC has ensured that the location of equipment is carefully considered to ensure that images captured comply with the GDPR.
- 1.2 Cameras are mounted in such a way as to avoid pointing directly at occupied properties and the adjacent school, and care will be taken to ensure that reasonable privacy expectations are not violated.
- 1.3 Where legitimate objections are received from occupiers of properties within the clear field of view, the Council will attempt to address these objections, which may include a demonstration of typical images obtained. If the objection cannot be addressed, measures shall be taken to fog or otherwise obscure images of the relevant property to create privacy zones. In these instances, requests for access to images of the property concerned in the event of a crime or incident cannot be considered.

2 Normal Operations

- 2.1 Other than for routine testing purposes, real-time CCTV images will not be monitored.
- 2.2 CCTV images will be automatically recorded on a secure, password-protected control unit, and shall be automatically deleted after a suitable period.
- 2.3 Recorded CCTV images will normally be accessed by authorised personnel only in the event of a qualifying incident, or during routine system testing.

3 Storage and Retention of CCTV Images

- 3.1 Recorded data will be retained for no longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely.

4 Applications to Review CCTV Images and Disclosure of Images to Third Parties

- 4.1 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 evidence has been captured by the CCTV system.
- 4.2 Individuals submitting applications for a review of CCTV recordings will be required to provide sufficient information to enable the request to be considered and for the relevant footage to be located. This will include the date, time, location, and nature of the incident.
- 4.3 An authorised person will then determine whether the incident warrants examination of the recording and whether there is a reasonable likelihood that the event or evidence has been captured by the CCTV system.
- 4.4 **The VHMC reserves the right to refuse to examine CCTV footage for minor or trivial events, or where dates and times cannot be provided, or if the likelihood of the event being captured by the CCTV system is low.**

- 4.5 Access to recorded images will be restricted to those personnel authorised to view them and will not be made more widely available.
- 4.6 There will be no disclosure of recorded data to third parties other than to enforcement authorities such as the Police, and statutory organisations where these would reasonably and lawfully need access to the data.
- 4.7 Applications should be made in writing to the Chairman of the VHMC. There may be a charge, which may be waived in the event that images of the crime or incident are captured by the CCTV system.

5 Subject Access Requests (SAR)

- 5.1 Individuals have the right to request access to CCTV footage relating to themselves under the GDPR. All requests should be made in writing to the Chairman of the VHMC. Individuals submitting requests for access will be required to provide proof of identity.
- 5.2 Individuals submitting requests for access will be required to provide sufficient information to enable the relevant footage to be identified. For example, the date, time, location, and description of the applicant. A recent photograph may also be required to aid identification.
- 5.3 No charge will be made for legitimate subject access requests. However, the VHMC reserves the right to charge an administrative fee or refuse to provide access to the recordings where requests are considered to be manifestly unfounded, excessive, or repetitive.
- 5.4 On receipt of the required information, the VHMC will endeavour to provide access to the footage as soon as is reasonably practical, but in any event not more than 30 days.
- 5.5 The VHMC may be unable to provide copies of recorded images where this may prejudice the legal rights of other individuals during a Police investigation.

6 Policy Review and Complaints Procedures

- 6.1 Policies, procedures, passwords and authorised personnel will be reviewed annually and updated as necessary.
- 6.2 Complaints and enquiries about the operation of CCTV by the VHMC should be directed to the Chairman of the VHMC in the first instance.

7 Further Information

- 7.1 Further information on CCTV and its use is available from the following:
 - CCTV Code of Practice (published by the Information Commissioners Office)
 - Surveillance Camera Code of Practice (published by the Surveillance Camera Commissioner)
 - Data Protection Act 1998
 - General Data Protection Regulation
 - Protection of Freedoms Act 2012
 - Human Rights Act 1998