

Baginton Village Hall

Registered Charity 522830

CCTV Policy

Introduction

Closed circuit television ("CCTV") is installed at Baginton Village Hall (BVH). Cameras are located at various places on the premises and images from the cameras are recorded digitally and then automatically recorded over after approximately two weeks. This document details the policy and procedures used to control the management, operation, use and confidentiality of the CCTV system.

Purpose and Objectives

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 the Police (and other Law Enforcement Agencies) to carry out their lawful duties
2. This use of CCTV falls within the scope of The Data Protection Act and The General Data Protection Regulation. BVH complies with the Information Commissioner's Office (ICO) CCTV Guidance to ensure that it is used responsibly. This guidance is published on the ICO Website, www.ico.org.uk. BVH is registered with the ICO and the data protection registration certificate is displayed on the notice board in the entrance hall.

Warning Signs

CCTV warning signs are clearly and prominently displayed. The sign at the gates, which is the public entrance to the area covered by the cameras, includes the reason for using CCTV, who it is controlled by and the contact details for any queries.

Siting the Cameras and Coverage

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

The CCTV system comprises of four cameras covering the car park (two cameras) and the grounds to both sides of the hall. Cameras have been sited carefully so that they only capture images relevant to the purposes for which they are installed (described in "Purpose and Objectives" above) and care has been taken to ensure that reasonable privacy expectations are not violated. Every effort has been made by BVH to position cameras so that their coverage is restricted to the BVH premises which may include public areas. The system does not have any sound recording capability.

Storage and Retention of CCTV images

Data is stored automatically on a digital recorder, which is located in a non-public area of BVH and to which only of the BVH Management Committee and Caretaker have access.

Normally, recorded data will not be retained for longer than two weeks as the recorder overwrites data on reaching full capacity. On occasion, images may need to be retained longer where, for example, an incident has been identified and the Police 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, and disclosure of, recorded images is restricted to members of the BVH Management Committee, the Police and our Insurance Company loss adjustors (if required) for the purposes of our security and safety only, to ensure that the rights of individuals are retained. The Committee reserves the right to monitor the CCTV at random intervals.

The Trustees, Chair, Secretary and Treasurer of BVH Management Committee and the Caretaker have access to a cloud-based application to be able to view live and recorded images using a secure mobile app. Other than for routine testing purposes, real time CCTV images will not normally be monitored unless it is to check the security of the premises or if it is thought that an incident is happening at that time. Recorded CCTV images will normally be accessed only in the event of a qualifying incident or during routine system testing.

Disclosure of information will be controlled and consistent with the purposes for which the CCTV system has been established.

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

- The disclosure of images will be in line with the above objectives and will be controlled under the supervision of the Chair of the Committee;
- In all instances, a member of the Committee will view the footage to see if it is appropriate for any to be disclosed, noting that the system only allows for short (less than 5 minute) segments to be saved;
- A log will be maintained itemising the date, time(s), camera, person copying, person receiving and reason for the disclosure;
- The appropriate disclosure documentation will be obtained from the Police and filed for future reference;
- Images must not be forwarded to the media for entertainment purposes or be placed on the internet. Images will only be released to the media for identification purposes in liaison with the Police;
- Images must not be copied in any way, e.g. photographed, downloaded or printed for use other than described in the Objectives in point 1;
- The method of disclosing images should be secure to ensure that they are only seen by the intended recipient;
- Images of third parties not relevant to the investigation should be obscured where possible to prevent unnecessary identification. This can only be done on a still image.

Subject Access Requests

Under The General Data Protection Regulation, individuals have the right to request access to CCTV footage, but only that relating solely to themselves. Access cannot be requested on behalf of a group or be used to obtain images to identify other people, which would prejudice their legal rights. All requests for access should be made by e-mail or in writing to the BVH Management Committee, providing sufficient information to enable the footage relating to them to be identified, i.e. date, time and location. BVH will respond to requests within two weeks of receiving the written request.

All requests for access are recorded. If disclosure is denied, the reason is documented and the individual will be informed within at least two weeks of the reason and their right to complain to a statutory authority. BVH 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 fee of £10 may be charged for a Subject Access Request, depending on circumstances.

Complaints

Enquiries or complaints about the operation of BVH's CCTV system should be directed to the BVH Management Committee in the first instance at baginton.vh@gmail.com.

Review

This policy will be reviewed at least annually by the Management Committee.