

Wanborough Village Hall CCTV Policy

Wanborough Village Hall (“WVH”) is a registered charity, number 267126.

Closed circuit television (“CCTV”) is installed at 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

- 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
 - to assist in resolving any disputes with hirers.
- 2 This use of CCTV falls within the scope of The Data Protection Act 2018 and The General Data Protection Regulation 2018. 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 on the front on the building. These signs include contact details of the Lettings secretary.

Siting the Cameras and Coverage

The planning and design has endeavoured to ensure that the CCTV system gives maximum effectiveness and efficiency. The number and siting of cameras has been reviewed since a security incident in 2019. 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 WVH to position cameras so that their coverage is restricted to the WVH premises which may include public areas.

The cameras are sited (a) on the four external corners of the building overlooking front and rear entrance doors, the car park and under the rear canopy, (b) above the side porch overlooking the path from the gate at the Recreation ground, (c) in the side porch entrance, and (d) in the cupboard which contains the AV equipment.

Storage and Retention of CCTV images

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

Normally, recorded data will not be retained for longer than 4 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 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 WVH Management Committee (WVHMC). The Treasurer of WVHMC has access to a cloud-based application to be able to view live and recorded images using a secure mobile app.

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 Data Controller 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.

Subject Access Requests

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

All requests for access should be made by e-mail or in writing to the WVMC, providing sufficient information to enable the footage relating to them to be identified, ie date, time and location. 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 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. 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 fee of £10 may be charged for a Subject Access Request, depending on circumstances.

Complaints

Enquiries or complaints about the operation of WVH's CCTV system should be directed to the WVH Lettings secretary in the first instance at wvhletting@gmail.com.

Review

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

WANBOROUGH VILLAGE HALL

CCTV NOTICE

The CCTV system installed at Wanborough Village Hall (“WVH”) and the images produced by it are controlled by the WVH Management Committee which is responsible for how the system is used.

The WVHMC has considered the need for using CCTV and has decided that it is required for the prevention and detection of crime and for protecting the safety and security of WVH volunteers, staff, hirers, visitors and contractors. It will not be used for other purposes and an annual review of the use of CCTV will be conducted.

Date of Review: Feb 2022

Date of Next Review: Feb 2023

Each of the Criteria listed below has been checked and confirmed by the WVH Management Committee:

- Notification has been submitted to the Information Commissioner (Ref C1079727) and the next renewal date is recorded.
- There is a named individual who is responsible for the operation of the system.
- The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed at least annually.
- A system has been chosen which produces clear images which the Law Enforcement Agencies can use to investigate crime and these can easily be taken from the system when required.
- Cameras have been sited so that they provide clear images.
- Cameras have been positioned to avoid capturing the images of persons not visiting the premises.
- There are visible signs showing that CCTV is in operation, who is responsible for installing and maintaining the system and WVH contact details.
- Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.
- The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.
- Except for Law Enforcement Agencies, images will not be provided to third parties.
- The potential impact on individuals' privacy has been identified and taken into account in the use of the system.
- The organisation knows how to respond to individuals making requests for copies of their own images.
- Regular checks are carried out to ensure that the system is working properly and produces high quality images.