



## Hagley Community Association CCTV policy

### Introduction

Hagley Community Association (HCA) is a registered charity, number 523146. Closed Circuit Television (CCTV) is installed at Hagley Community Centre, with cameras located at various places on the premises. Images from the cameras are recorded digitally and are overwritten after approximately fifteen days.

This document details the policy and procedures used to control the management, operation and confidentiality of the system.

Name of Data Controller	Hagley Community Association Committee
Name of Controller contact	Annette Templar: minits@hagley.uk

### Purpose & Objectives

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.

This use of CCTV falls within the scope of The Data Protection Act 2018 and The General Data Protection Regulation 2018 and is compliant with the Information Commissioner's Office (ICO) CCTV Code of Practice.

### Positioning of the Cameras and Coverage

The planning and design of the system aims to maximise its effectiveness and efficiency but doesn't guarantee that it will detect every incident that occurs in the areas of coverage.

Cameras are positioned so that they capture only images relevant to the purposes described above, and care has been taken to ensure that reasonable privacy expectations are not violated

The cameras are sited on the rear of the building, overlooking the car park, the back door, the front door, the two entrance halls and the main hall



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

Recorded data is stored automatically for up to 25 days on a recorder which is secured within the Community Centre and to which only 2 members of the HCA 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.

Recorded data will not be retained for longer than 25 days unless any of the following applies:

- an incident has been identified
- a Subject Access Request has been made
- a Law Enforcement Agency requests extra time to collect relevant images or is investigating a crime and ask for images to be preserved 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 2 members of the HCA Management Committee. Disclosure of information will be controlled and relevant to the purpose for which CCTV has been installed. Once information is disclosed to a Law Enforcement Agency, they are the Data Controller for the copy which they hold.

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 Data Controller
- A log will be maintained itemising the date, time(s), camera, person copying, person receiving and reason for the disclosure
- The appropriate disclosure documentation from the Law Enforcement Agencies will be filed for future reference
- Images must not be copied in any way, eg photographed, downloaded or printed for use other than described in the objectives
- Images will only be released to the media for identification purposes in liaison with the Law Enforcement Agencies;
- 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.

### **Subject Access Requests**

Under the UK General Data Protection Regulation, individuals have the right to request access to CCTV footage relating to themselves.



All requests for access should be made by email or in writing to the HCA Secretary providing sufficient information to enable the relevant footage to be identified, i.e. date, time and location. HCA will respond to requests within 4 weeks of receipt.

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

### **Warning Signs**

CCTV warning signs are displayed at the main entrance. These signs include details of the Data Controller responsible for the system.

### **Complaints**

Enquiries or complaints about the operation of Hagley Community Centre's CCTV system should be emailed to the HCA Secretary at [minits@hagley.uk](mailto:minits@hagley.uk), or by phone to the Bookings Officer on 07891 365290

### **Review**

This policy will be reviewed annually by the HCA Management Committee or sooner if new legislation is introduced.

The CCTV notice included with this policy will provide a checklist for the HCA Management Committee and is displayed on the noticeboard in the Community Centre entrance to provide information on the use of CCTV to volunteers, hirers, visitors and contractors.

### **HCA Privacy Policy**

In addition to this document, HCA has a Privacy Policy on its website which provides detailed information for hirers on when and why we collect their personal information, how we use it, and how we keep it secure. To view this policy visit [www.hagley.uk](http://www.hagley.uk)



## HAGLEY COMMUNITY CENTRE CCTV NOTICE

The CCTV system installed at Hagley Community Centre and the images it produces are controlled by the HCA Management Committee which is responsible for how the system is used. Day-to-day operational responsibility lies with the Data Controller (HCA Secretary) who is a Trustee and member of the Committee.

The HCA Management Committee considered the need for using CCTV and decided that it is essential for the prevention and detection of anti-social behaviour and for promoting the safety and security of HCA volunteers, hirers, visitors and contractors. It will not be used for other purposes and use of CCTV will be reviewed annually.

Date of Review: April 2024

Date of Next Review: April 2025

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

- Notification has been submitted to the Information Commissioner and the next renewal date is recorded.
- There is a named individual who is responsible for the operation of the system.
- Its purpose is clearly defined and installing cameras is an appropriate measure. This decision will be reviewed annually.
- Cameras have been sited so that they provide clear images which Law Enforcement Agencies can use to investigate crime and can be copied on request.
- Cameras have been positioned to avoid capturing the images of persons not visiting the premises.
- There are signs showing that CCTV is in operation, and who is responsible for managing it.
- Images from this CCTV system are securely stored, and only a limited number of authorised persons can access them.
- The recorded images will be retained only for the time needed for any incident to be investigated.
- With the exception of Law Enforcement Agencies, images will not be provided to third parties.
- The potential impact on individuals' privacy has been assessed and taken into account in the use of the system.
- HCA Management Committee 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 functioning correctly.



<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high



## Step 6: Identify measures to reduce risk

<b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5</b>				
<b>Risk</b>	<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved</b>
		Eliminated reduced accepted	Low medium high	Yes/no



## Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA