

CCTV Policy: Hillstown Miners Welfare Trust (HMWT)

Closed Circuit Television (CCTV) cameras are used for a variety of purposes and are an effective way of reducing crime and protecting public safety. We are registered with ICO and subscribe to the annual data protection cover and code of practice.

OBJECTIVES OF THE SYSTEM :

- **Security** – to prevent theft, breaking and entering and misuse of the site.¹
- **Health and Safety** – to ensure that health and safety procedures are being abided by.²
- **Business interests** – to ensure misconduct or gross misconduct is prevented.³
- **Assessment and improvement** of processes and productivity.⁴

1. **Security:** To protect HMWT buildings and equipment, and the personal property of users, staff, volunteers, visitors and members of the public.
 - a. To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
 - b. Key holders for **regular users** should be kept to a **minimum**. This can lead to unauthorised use of the buildings & site, especially in the evenings and weekends. Any unauthorised use to be immediately reported to the manage and trustees.
2. **Health and Safety:** To protect users, staff, volunteers, visitors and members of the public with regard to their personal safety and meet requirements of our **Safeguarding Policy**
 - a. Accidents can occur and video evidence may help the safety officer/manager/trustees to evaluate for future prevention.
3. **Business interests:** Under certain circumstances all personnel on the site could be monitored with the approval of the trustees if misconduct is suspected.
4. **Assessment and improvement:** Obtaining the way the site is used through CCTV can help in planning, improve safety and the efficient running of the site.

CCTV is accessible by key DBS checked trustees or staff only. (Trustees: JK, KB. Manager: JG)

POLICY STATEMENT

1. The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System of the site . It also serves as a guide to data for users, staff, volunteers, visitors and members of the public, regarding their rights in relation to personal data recorded via the CCTV system (the **System**).

2. The System is administered and managed by the Hillstown Miners' Welfare Trust, who act as the Data Controller. This policy will be subject to review and should be read with reference to our **Data Protection Policy (Users)**. For further guidance, please review the Information Commissioner's CCTV Code of Practice (accessible here. <https://ico.org.uk/media/fororganisations/documents/1542/cctv-code-of-practice.pdf>)
3. All fixed cameras are in plain sight on the site and does not use CCTV for covert monitoring or monitoring of private property outside its grounds.
4. The purposes of using the CCTV system are set out below and, having fully considered the privacy rights of individuals, the trustees believe the purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

POSITIONING

5. Locations have been selected, both inside and outside of the buildings and grounds, that the Trustees reasonably believes require monitoring to address the stated objectives.
6. Adequate signage has been placed in prominent positions to inform the public that they are entering a monitored area, identifying the Trustees as the Data Controller and giving contact details for further information regarding the system.
7. No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
8. No images of public spaces will be captured except to a limited extent of camera overspill of the intended areas.

MAINTENANCE

9. The CCTV System will be operational 24 hours a day, every day of the year.
The System Manager* will check and confirm that the System is properly recording and that cameras are functioning correctly, on a regular basis.
The System will be checked and (to the extent necessary) serviced as required.

SUPERVISION OF THE SYSTEM

10. Staff authorised by the Trustees to conduct routine supervision of the System may include members of the site services and relevant staff on duty.
11. Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

STORAGE OF DATA

12. The day-to-day management of images will be the responsibility of a System Manager, or such suitable person as the System Manager shall appoint in his or her absence.
13. Images will be stored for 30 days and automatically over-written unless the Trustees considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
14. Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy (Users). Information including the date, time and length of the recording, as well as the locations covered and groups or individuals recorded, will be recorded in the system log book.

ACCESS TO IMAGES

15. Access to stored CCTV images will only be given to authorised persons, under the supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
16. Individuals also have the right to access personal data HMWT holds on them (please see the Data Protection Policy Users), including information held on the System, if it has been kept. The Trustees will require specific details including at least to time, date and camera location before it can properly respond to any such requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.
17. The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:
 - a. Where required to do so by designated Trustees, the Police or some relevant statutory authority.
 - b. To make a report regarding suspected criminal behaviour.
 - c. To examine behaviour which may give rise to any reasonable safeguarding concern.
 - d. To assist HMWT in establishing facts in cases of unacceptable public behaviour, in which case, the police will be informed as part of the Trustees management of a particular incident;
 - e. To the HMWT insurance company where required in order to pursue a claim for damage done to insured property; or
 - f. In any other circumstances required under law or regulation.

18. Where images are disclosed to an **individual** as set out above a record will be made in the system logbook including the person viewing the images, the time of access, the reason for viewing the images, the details of images viewed and a crime incident number (if applicable).
19. Where images are provided to third parties under the terms set out above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

COMPLAINTS AND QUERIES

20. Any complaints or queries in relation to HMWT's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Key staff/trustees who will deal with the enquiries, or notify the Designated Trustees if further clarification is required .

CCTV FOOTAGE ACCESS REQUEST

21. The following information is required before HMWT can provide copies of or access to CCTV footage from which a person believes they may be identified.
 - a. Please note that CCTV footage may contain the information of others that needs to be protected, and that HVH typically deletes CCTV recordings after a 30 day period.

Name and address: (proof of ID may be required)	
Description of footage (including a description of yourself, clothing, activity etc.)	
Location of camera	
Date of footage sought	
Approximate time (give a range if necessary)	

Signature*

Print Name.....

Date

*** NB if requesting CCTV footage of a child under 13, a person with parental responsibility should sign this form. For children 13 or over, the child's authority or consent must be obtained except in circumstances where that would clearly be inappropriate and the lawful reasons to provide to the parent(s) outweigh the privacy considerations of the child.**

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Operational requirements.

Trustees to appoint key personnel to view recorded material (Holder of Disclosure and Barring Service (DBS) certificate.

- 22. Holders to make sure appropriate steps are adhered to.
- 23. Designated authorized persons to view CCTV material DBS holders.
- 24. Reference also made in . Data Protection Policy (Users)
- 25. CCTV footage access request form.
- 26. Signage. This area is covered by CCTV. Data controller, Contact, Hillstown Miners Welfare Trust.