

CCTV POLICY

Policy Statement

Please note that while the policy itself is non-statutory there is legislation covering data protection which must be adhered to. This policy should be read with reference to the Data Protection Act 1998, the Protection of Freedoms Act 2012 and the CCTV code of practice 2008 from the Information Commissioner's Office (ICO) available at:-

<https://ico.org.uk/for-organisations/guide-to-data-protection/key-dp-themes/guidance-on-video-surveillance-including-cctv/>

This policy should also be read in conjunction with the pre-school's 'Data Protection Policy'.

Introduction

Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act and the Information Commissioner's Office (ICO) has issued a code of practice on compliance with legal obligations under that Act. The use of CCTV by pre-schools is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is.

Objectives and Targets

Longwick Pre-school operates out of Longwick Village Hall. The Village Hall Committee have installed the cameras and has responsibility for the maintenance of the cameras and the administration, storage and retention of the images.

This CCTV policy explains how our pre-school will operate its CCTV equipment and comply with the current legislation.

Action Plan

- The purpose of the CCTV equipment is to provide a safer, more secure environment for all users of the hall, including the children and staff during the hours the pre-school operates and to prevent vandalism and theft. Essentially it is used for:-
- The prevention, investigation and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Safeguarding public, children's and staff safety.
- Monitoring the security of the site.

The Village Hall Committee does not use the CCTV system for covert monitoring.

Location

Cameras are located in those areas where the Village Hall Committee has identified a need and where other solutions are ineffective. The village hall CCTV system is used solely for purposes(s) identified above and is not used to routinely monitor staff or student conduct.

Maintenance

The CCTV system is maintained by the Village Hall Committee under an annual maintenance contract that includes periodic inspections. The contractors are responsible for:-

- Ensuring the Village Hall Committee complies with its responsibilities in relation to guidance on the location of the camera.
- Ensuring the date and time reference are accurate.
- Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- Ensuring that cameras are protected from vandalism in order to ensure that they remain in working order.

Identification

In areas where CCTV is used we will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area. The signs will:-

- Be clearly visible and readable.
- Be an appropriate size depending on context.

Type of equipment

The standard CCTV cameras record visual images only and do not record sound.

Administration

The role of Data Controller is delegated to Julie Lawrence (Longwick Village Hall Caretaker) and she has responsibility for the control of images and deciding how the CCTV system is used, in accordance with the village hall CCTV policy. The village hall is registered with the Information Commissioner's Office, the registration includes the use of CCTV images and the purpose for which the images are used. All operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities under the CCTV Code of Practice. Access to recorded images is restricted to staff that need to have access in order to achieve the purpose of using the equipment. All access to the medium on which the images are recorded is documented. All employees are aware of the restrictions in relation to access to, and

disclosure of, recorded image, all employees of the pre-school and those with responsibility for monitoring the CCTV have been DBS checked.

Image Storage, Viewing and Retention

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the Data Controller, Julie Lawrence, unless the monitor displays a scene which is in plain sight from the monitored location. Recorded images can only be viewed in a restricted area by approved staff. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of children, staff or visitors. The Data Controller reserves the right to use images captured on CCTV where there is activity that the Data Controller cannot be expected to ignore such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. Images retained for evidential purposes will be retained in a locked area accessible by the Data Controller only. Where images are retained, the Data Controller will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed. Neither the Data Protection Act nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The Data Controller follows the protocol of the Village Hall Committee which stipulates that images are stored for one month. Once the retention period has expired, the images are overwritten.

Disclosure

Disclosure of the recorded images to third parties can only be authorised by the Data Controller. Disclosure will only be granted:-

- If its release is fair to the individuals concerned.
- If there is an overriding legal obligation (e.g. information access rights).
- If it is consistent with the purpose for which the system was established.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented. NB: Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

Subject Access Requests

Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If the Data Controller receives a request under the Data Protection Act it will comply with requests within 40 calendar days of receiving the request. The Data Controller may charge a fee for the provision of a copy of the images. If the Data Controller receives a request under the Freedom of Information Act it will comply with requests within 20 working days of receiving the request. As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request. Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system. Requests for access should be addressed to the Data Controller. Refusal to disclose images may be appropriate where its release is:-

- Likely to cause substantial and unwarranted damage to that individual.
- To prevent automated decisions from being taken in relation to that individual.


Monitoring and Evaluation

The Village Hall Committee undertakes regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:-

- Its stated purpose
- The location
- The images recorded
- Storage length.
- Deletion.

Reviewing

The efficacy of this policy will be reviewed annually by the Committee at the AGM. If the Village Hall Committee decides to change the way in which it uses CCTV, they will inform the Information Commissioner within 28 days.

<i>Date Policy Implemented</i>	<i>September 2019</i>
<i>Signed</i>	
<i>Name and Role</i>	<i>Alex Barter, Committee Management Chair</i>
<i>Date of Last Review</i>	<i>November 2023</i>
<i>Date of Next Review</i>	<i>November 2024</i>