

# Alderholt Village Hall

1 Station Road  
Alderholt  
Dorset  
SP6 3RB



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## CCTV Policy

### Introduction

Closed circuit television ("CCTV") is installed at Alderholt Village Hall (AVH). 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

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. AVH complies with the Information Commissioner's Office ("ICO").

### CCTV Code of Practice

<https://www.gov.uk/government/publications/update-to-surveillance-camera-code/amended-surveillance-camera-code-of-practice-accessible-version>

### Warning Signs

CCTV warning signs are clearly and prominently displayed at AVH by each of the fitted cameras. These signs include the contact details of the person to contact in an emergency.

### Positioning of each camera and its coverage

The positioning of each camera has been decided to ensure that the CCTV system gives maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

### Location of Cameras

- All cameras are clearly visible and located at strategic points around the exterior of the premises.
- Cameras are positioned so that they only cover communal or public areas around the premises and they have been sited so that they provide clear images.
- No camera focuses, or will focus, inside the building.
- Care has been taken to ensure that reasonable privacy expectations are not violated.
- Appropriate signs are prominently displayed so that all visitors are aware they are entering an area covered by CCTV.
- Every effort has been made by AVH to position cameras so that their coverage is restricted to the AVH premises.

The cameras are sited on:

- (a) the corner of the Committee Room, which overlooks the car park entrance
- (b) The side of the hall leading to the back garden
- (c) the rear of the hall by the emergency exit, including the Portakabin.

Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

### **Storage and Retention of CCTV Images**

Recorded data is stored automatically on a recorder which is secured within AVH and to which only the AVH Management Committee have access. Images are recorded in constant real-time (24 hours a day throughout the year). 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.

Normally, recorded data will not be retained for longer than 21 days. On occasion, images may need to be retained longer where, for example, an incident has been identified or a Subject Access Request (SAR) 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**

Under the Data Protection Act 1998, individuals have the right on request to receive a copy of the personal data that the Committee holds about them, including CCTV images if they are recognisable from the image. Access to recorded images is restricted to members of the AVH Management Committee, all of whom are deemed by The Charity Commission to be legal Trustees and committee of AVH. 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 manager for the copy which they hold, in each medium it was recorded.

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 manager or chairman.

- 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 forwarded to the media for entertainment purposes or be placed on the internet.
- 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 (SAR)**

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 AVH chairman, providing sufficient information to enable the footage relating to them to be identified, i.e. date, time and location.
- AVH will respond to requests within 4 weeks of receiving the written / e-mailed request.
- The Committee will always check the identity of the person making the request before processing the request.
- The Data Protection Officer (Chairman and one nominated committee member), will first determine whether disclosure of requested images will reveal third party information, as no-one has a right to access CCTV images relating to other people. In such a case, the image of any third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.
- If information is requested for a third party they must evidence that they have a right to do so, (such as carer).
- Requests for any access will be recorded.
- If disclosure is denied, the reason will be documented and the individual will be informed within at least 4 weeks of the reason and their right to complain to a statutory authority.
- AVH 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 (SAR), depending on the circumstances.

### **Complaints**

Enquiries or complaints about the operation of AVH's CCTV system should be directed to the AVH chairman in the first instance at [chairalderholt@gmail.com](mailto:chairalderholt@gmail.com).

## **Review**

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

**Next Review Date: July 2025**