

HIGGINBOTTOM RECREATIONAL CHARITY

Briston Pavilion, The Recreation Ground,
Stone Beck Lane,
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CCTV Governing Document

Introduction

This policy is to control the management, operation, use and confidentiality of the CCTV system owned by the Higginbottom Recreational Charity and located in the Briston Pavilion and on the Briston Recreational Ground, Stone Beck Lane, Briston NR24 2PS and that usage is clearly defined.

Ownership and operation

The CCTV system and all recorded material is owned by The Higginbottom Recreational Charity (HRC).

Principles

The following principles govern the operation of the CCTV system:

- The CCTV system will be operated fairly and lawfully and only for the purposes set out in this policy
- The CCTV system will be operated with due regard for privacy of the individual
- Any changes to the purposes for which the CCTV system is operated will require prior approval of the HRC Sole Trustee.
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Purpose of the CCTV system

The system is intended to provide an increased level of security inside the Briston Pavilion and on the Recreational Ground for the benefit of those who use and visit the premises/grounds.

The CCTV system will be used to respond to the following key objectives which will be subject to an annual assessment:

- To detect, prevent or reduce the incidence of crime
- To prevent and respond effectively to all forms of harassment and disorder.
- To reduce the fear of crime
- To create a safer environment
- To gather evidence by a fair and accountable method
- To provide emergency services assistance
- To assist with health and safety and other serious occurrences

As confidence in the system is essential, all cameras will be operational. An appropriate maintenance programme will be established and an accredited contractor employed to carry out this work. This contractor will have access to the system for servicing/maintenance purposes only.

System details

The CCTV system comprises visible cameras situated in various locations around the Recreation Ground and covers the entrance/exits of the rooms known as Loftys and the Main Hall and will continuously record activities in these areas. The images are stored in digital video recorders which are kept in a secure locked area accessible only by authorised staff.

Installation and signage

Cameras will not be hidden from view and signs will be prominently displayed at the entrances to the site and building. The signs will indicate:

- The presence of monitoring and recording
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Covert recording

There are no covert cameras installed on the site or within the building.

General Data Protection Regulation (GDPR)

Where images of living, identifiable individuals are deliberately recorded, this is likely to compromise those individual's personal data. The collection, use and storage of personal data is governed by the GDPR and the Data Protection Act 2018.

Given that any particular sequence of CCTV recording may include personal data; all such recordings will be treated in accordance with the GDPR principles. These principles lie at the heart of the approach to processing personal data.

The GDPR sets out seven key principles:

Lawfulness, fairness and transparency - Processing of personal data for any of the law enforcement purposes must be lawful and fair.

Purpose limitation - The law enforcement purpose for which personal data is collected on any occasion must be specified, explicit and legitimate, and; Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected.

Data minimisation - Personal data processed for any of the law enforcement purposes must be adequate, relevant and not excessive in relation to the purpose for which it is processed.

Accuracy - Personal data processed for any of the law enforcement purposes must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate, having regard to the law enforcement purpose for which it is processed, is erased or rectified without delay.

Storage limitation - Personal data processed for any of the law enforcement purposes must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data for any of the law enforcement purposes.

Integrity and confidentiality (security) - Personal data processed for any of the law enforcement purposes must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, "appropriate security" includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Accountability – responsibility for complying with principles and to have appropriate processes and records in place to demonstrate that compliance.

HRC is registered with the Commissioner as a data controller operating CCTV.

Data subject's rights, include a right of access to their personal data which will be respected where recordings are confirmed to comprise personal data. Where an individual requests access to recordings believed to be their personal data, the matter will be referred to the Chairman of the Pavilion Management Committee.

Access to live footage and recordings

Images captured by the system will be monitored in a self-contained and secure room on the premises. For operational purposes, and in accordance with the stated purposes of the system, only designated staff, trained in their duties, will have access to live footage. A list of these staff are the Parish Clerk, Jenny English; HRC Management Committee members Peter Moulton, Hayley Quinsey and Noeleen Woodhouse and is updated as appropriate.

Non-essential access to the CCTV system will be controlled by means of keypad access lock, with access levels controlled and monitored by the Data Controller.

Access codes will be changed regularly and if compromised. The codes will be stored securely, with a hard copy of the master code kept by the Chairman of the Management Committee and updated each time the code is changed.

Access to recordings.

For operational purposes and in accordance with the stated purposes of the system, only designated staff will have primary access to CCTV recordings. The Data Controller or nominee may permit the viewing of CCTV recorded materials by Police and other staff where this is necessary in connection with a serious occurrence. The Data Controller or nominee will have authority for making a decision regarding who should have access to this data other than designated staff and ensuring that data is used in accordance with the GDPR.

Downloading of recorded material

Pre-recorded CCTV data should not be downloaded due to potential infringement of the GDPR. Data should only be downloaded or saved if it forms part of an investigation into a serious occurrence.

Once a request to save information is received the Data Controller, (or in his/her absence the Assistant Data Controller), will collate the required data. Any data saved to disc will be placed in a sealed evidence bag along with a digital evidence log sheet. This log will be signed by the person downloading the data and also by the Investigating Officer requesting the information.

Access by Data Subjects

CCTV digital images, if they show a recognisable person, are personal data and are covered by the GDPR. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Regulation.

Data Subjects may make a Subject Access Request for CCTV images/recordings/information (request for data about themselves) by applying in writing to the Chairman of the Higginbottom Management Committee and must provide the following information:

1. dates and times of the incident or their visit to the Pavilion/Recreation Ground with details of the specific location on premises;
2. two photographs – one full face and one side view;
3. proof of identity (e.g driving licence/passport containing a photograph);
4. cheque or cash in the sum of £10.00.

A response will be provided promptly and in any event within 40 calendar days of receiving the required fee and information.

HRC has the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

Retention and disposal of recorded materials

CCTV recordings and other materials produced from them will be retained for one calendar month unless an incident is recorded which requires further investigation. In the latter case, recordings shall be kept for a period of three years from the date of recording.

All media no longer required, on which recordings were made will be returned to the Data Controller to be shredded and the appropriate details entered in the destruction records.

Breaches of the code and complaints

A copy of this policy will be made available to anyone requesting it. Breaches of this policy should be reported immediately to the Data Controller. Any complaint concerning misuse of the system will be treated seriously and fully investigated.

Breaches of this policy will be dealt with in accordance with the appropriate disciplinary policy. Serious breaches of this policy may result in criminal liability on behalf of the individual which may also be considered as gross misconduct.

Contact Details:

Data Controller: Peter Moulton

Assistant Data Controller: Hayley Quinsey 07500 058310

Nominated Access: Noeleen Woodhouse 07795 564 453

Higginbottom Charity Trust Chairman: Ian Chilton

Information Commissioners Offices Reference number ZA047315

Date of renewal 01/05/2020

Signed: Ian Chilton

Dated: 03.01.2020