

Grittleton, Sevington and Leigh Delamere village Hall and Grittleton Cricket Club CCTV Policy: 1 May 2024

Introduction

Grittleton, Sevington and Leigh Delamere village hall (“GVH”) is a registered charity, number 290380. Closed circuit television (“CCTV”) is installed at both the village hall and cricket pavilion buildings at the GVH site. Cameras are located at various places on the buildings 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. GVH complies with the Information Commissioner’s Office (“ICO”) CCTV Code of Practice to ensure that it is used responsibly.

GDPR and administrative roles

The *Data Controller* for the system are the trustees of the village hall and the post holders of Grittleton Cricket Club.

The *Data Administrators* refers to the individuals who are responsible for the running and monitoring of the CCTV system. They can be contacted via email at cctvadmin@grittletoncricketclub.org.uk.

Siting the Cameras and Coverage

The planning and design has endeavoured 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. Cameras have been sited carefully so that they only capture images relevant to the purposes for which they are installed (described in “Purpose” above) and care has been taken to ensure that reasonable privacy expectations are not violated. Every effort has been made by GVH to position cameras so that their coverage is restricted to the GVH premises which may include public areas.

The cameras are sited thus:

- Village Hall
 - In the foyer, aligned to the front door
 - On the west side, covering the approach to the hall and the car park
 - One on the road side gable covering the side car park
 - One on the road side gable end covering the approach to the playground
 - One on the rear of the hall covering the playground and MUGA
- Cricket Pavilion
 - On the front under the clock
 - On the right hand side covering the machine shed
 - On the left hand side covering the net area
 - On the veranda covering the front door.

CCTV warning signs are clearly and prominently displayed at key points on both buildings.

Storage, Retention, and Access to CCTV images

Recorded data is stored automatically for up approximately one week and to which only the GVH Data Administrator and the Data Controller, 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. On occasion, images may need to be retained longer where, for example, an incident has been identified or a Subject Access Request 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 and Disclosure of Images

Access to, and disclosure of, images recorded on the CCTV equipment is restricted to the Data controller and administrators, and the Police or other law enforcement agencies, to ensure that the rights of individuals are retained. Images will only be disclosed in accordance with the purposes for which they were originally collected. The images filmed are recorded centrally and held in a secure location. If media on which images are recorded are removed for viewing purposes, this will be documented. All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded. Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- a) The Police and other Law Enforcement Agencies, where the images recorded could assist in the:
 - I. Prevention or detection of a crime.
 - II. Identification and prosecution of an offender.
 - III. Identification of a victim or witness.
- b) Prosecution agencies, such as the Crown Prosecution Service.
- c) Relevant legal representatives.
- d) Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

Subject Access Requests and Complaints

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 GVH Data Administrators providing sufficient information to enable the footage relating to them to be identified, i.e. date, time and location. GVH will respond to requests within 4 weeks of receiving the written request. All requests for access are recorded. If disclosure is denied, the reason is documented and the individual will be informed within at least 4 weeks of the reason and their right to complain to a statutory authority. GVH 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, depending on circumstances.

Enquiries or complaints about the operation of GVH's CCTV system should be directed to the GVH Administrators in the first instance as defined above.