

BENENDEN VILLAGE HALL CLOSED CIRCUIT TELEVISION POLICY

1. Introduction

- a. The purpose of this document is to regulate the management, operation and use of Closed Circuit Television (CCTV) systems at Benenden Village Hall (BVH).
- b. BVH has CCTV installed within and around the building in order to provide a safe and secure environment for members of the public and staff, and to prevent loss or damage.
- c. The system does not operate during booking times and is triggered by unauthorised access to the building.
- d. The system is owned and operated by BVH and comprises of 6 Blink cameras
- e. BVH's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, are covered by the Data Protection Act 1998. This policy outlines BVH's use of CCTV and how it complies with the Act.
- f. All authorised operators approved to access images are aware of the procedures that need to be followed when accessing the recorded images and sound, and understand their responsibilities as part of the requirements of this policy, safeguarding, e-safety information and the Data Protection Act.
- g. All employees are aware of the restrictions in relation to storage of, access to, and disclosure of, recorded images and sound. Failure to adhere to these requirements could lead to disciplinary action.

2. Statement of Intent

- a. BVH complies with the Information Commissioners Office (ICO) CCTV Code of Practice to ensure that it is used responsibly. This code of practice is published on the ICO Website <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>.
- b. Notices are displayed around the building to inform people of the presence of the CCTV system.
- c. The planning and design of the system should minimise any invasion of privacy and ensure that the scheme gives maximum effectiveness and efficiency.

3. Siting of Cameras

- a. Cameras are sited so they only capture images relevant to the purposes for which they are installed, as set out above.
- b. The Managers BVH will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.
- c. Cameras are pointed towards various access points to BVH and high-value storage areas.
- d. Cameras will be checked monthly by BVH staff to ensure they have not been moved or tampered with.
- e. Only suitably competent contractors with the relevant knowledge and experience will be employed to install and maintain the equipment.

4. Storage and Retention of CCTV Images

- a. Images are automatically recorded on a secure, password protected control unit, and are automatically deleted after a period of 2 weeks, unless there is a valid reason to securely hold these images for longer whilst any investigations take place.

5. Access to CCTV Images

- a. Access to any recordings is restricted to BVH staff authorised to view them for the purposes of security and safety only.
- b. Other than for routine testing purposes, real time images are not monitored unless it is thought that an incident is happening at that time.
- c. Recorded images are accessed by named authorised personnel only in the event of a qualifying incident or during routine system testing.
- d. At all times precautions are taken to protect the rights of the people whose images have been recorded.
- e. A log is maintained of when footage is accessed and reviewed (name of reviewer, date & reason).

6. Subject Access Requests

- a. Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act or to be reviewed when a crime or incident has occurred and there is a reasonable likelihood that the event or incident was captured by the system.
- b. Any requests to access images should be made in writing to the Village Hall Manager.
- c. Individuals submitting requests for access will have to provide sufficient information to enable the footage relating to them to be identified and isolated.
- d. BVH will respond promptly, and within no longer than 40 calendar days, of receiving the written request.
- e. At the Trust's discretion, a fee of up to £10 may be charged per Subject Access Request.
- f. BVH reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation. Where images of other individuals are on the CCTV footage their permission will be sought before access is allowed.
- g. All requests will be reviewed in line with this policy and full reasons will be provided if any request is declined.

7. Access to and Disclosure of Images to Third Parties

- a. There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to BVH where these would reasonably need access to the data (eg insurance company loss adjusters, investigators).

8. Complaints

- a. In the first instance any concerns or complaints regarding the system should be directed to the BVH Manager, enquiries@benendenvillagehall.org. If any issue remains unresolved it should be passed to the Manager, Benenden Village Trust, bvtrust@gmail.com.

9. Review

- a. This policy will be reviewed every 2 years, or sooner if required due to changes in legislation or statutory guidance or changes to the system.

Date of approval : 13th January 2022

Review date : 13th January 2024