



# Benenden Village Hall

The Street, Benenden, Kent. TN17 4DE

Benenden Village Hall is an asset of the Benenden Village Trust, Registered Charity 1176351

## **CLOSED-CIRCUIT TELEVISION (CCTV) POLICY**

### **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 cameras 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 CCTV system is active, and may be accessed, at all times but does not record during booking times. Recording is triggered by unauthorised access to the building outside of normal booking times.
- d. The system is owned and operated by Benenden Village Trust and is comprised of 6 internal & 4 external Blink cameras.
- e. In addition to the installed CCTV cameras, the electronic door entry system which uses facial recognition technology for allowing permitted access to the building will also capture images of persons using the system to gain access the building.
- f. 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 audio recordings, are covered by the Data Protection Act 1998. This policy outlines BVH's use of CCTV and how it complies with the Act.
- g. All authorised operators approved to access images are aware of the procedures that need to be followed when accessing CCTV recordings and understand their responsibilities as part of the requirements of this policy, safeguarding, e-safety information and the Data Protection Act.
- h. All employees are aware of the restrictions in relation to storage of, access to, and disclosure of, recorded images and audio. Failure to adhere to these requirements could lead to disciplinary action.

### **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.
- 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.

### **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 hall manager 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 key locations in and around the building.
- d. Cameras will be regularly checked by the hall manager 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.

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

- a. Images, and any associated audio, 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 recordings for longer whilst any investigations take place.

### **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. Real time CCTV footage is not routinely monitored. There may be occasions when it is necessary to confirm that a scheduled booking is taking place, check that an occasional hirer has managed to access the building or to confirm that the hall is available for cleaning or maintenance.
- 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, and any associated audio, have been recorded.

### **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 hall manager with 2 weeks of the event.
- 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 £10.00 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.

### **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 (e.g. insurance company loss adjustors, investigators).

### **Complaints**

- a. In the first instance any concerns or complaints regarding the system should be directed to the hall manager ([enquiries@benendenvillagehall.org](mailto:enquiries@benendenvillagehall.org)). If any issue remains unresolved it should be escalated to the Manager, Benenden Village Trust ([bvttrust@gmail.com](mailto:bvttrust@gmail.com)).

### **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.

Last Updated: December 2025