

CCTV Policy

1. Introduction

Woodley Village Hall (WVH) has in place a CCTV surveillance system (**CCTV system**) around and in the building. This policy details the purpose, use and management of the CCTV system at WVH and details the procedures to be followed in order to ensure that WVH complies with relevant legislation and the current Biometrics and Surveillance Camera Commissioner's [Surveillance Camera Code of Practice](#) .

WVH will have due regard to the *Data Protection Act 2018 (DPA 2018)*, the *General Data Protection Regulation (GDPR)* and any subsequent data protection legislation, and to the *Freedom of Information Act 2000*, the *Protection of Freedoms Act 2012* and the *Human Rights Act 1998*.

This policy is based upon guidance issued by the Information Commissioner's Office (**ICO**) (the [ICO Guidance](#)).

This policy and the procedures therein detailed, applies to the CCTV system installed at WVH only.

2. CCTV System Overview

The CCTV system is owned by Woodley Village Hall, School Road, Romsey, SO51 7NY and managed by the Woodley Village Hall Committee (the **Committee**). Under current data protection legislation WVH is the 'data controller' for the images produced by the CCTV system. WVH is registered with the ICO and the registration reference is ZB366908. The CCTV system operates to meet the requirements of the DPA 2018 and the ICO Guidance.

The Committee is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.

The CCTV system operates both externally and internally at WVH. Four cameras are located externally and one is located internally within the foyer. Cameras are not sited to focus on private residential areas. Further information regarding the number and location of CCTV cameras is available by contacting the Committee.

Signs are placed around WVH in order to inform visitors and members of the public that CCTV is in operation. The Committee is responsible for ensuring that adequate signage is erected in compliance with the ICO Guidance.

The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

3. Purposes of the CCTV System

The principal purposes of the WVH CCTV system are as follows:

- For the prevention, reduction, detection and investigation of crime and other incidents
- To ensure the safety of hall users, committee members, and visitors
- To assist in the investigation of suspected breaches of WVH regulations by hall users, contractors and visitors
- The monitoring and investigation of traffic related matters within the car park

The CCTV system will be used to periodically observe WVH and the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

WVH seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

4. Monitoring and Recording

Cameras are not continuously monitored, only being monitored periodically or when a need arises to review images.

Images are recorded centrally on recording equipment located securely in WVH and are viewable remotely or on site using a secure connection to the recording equipment from authorised laptop or mobile devices.

The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

All images recorded by the CCTV System remain the property and copyright of WVH.

5. Compliance with Data Protection Legislation

In the administration of its CCTV system, WVH complies with the GDPR and the DPA 2018. Due regard is given to the data protection principles embodied in the GDPR. These principles require that personal data shall be:

- a. Processed lawfully, fairly and in a transparent manner.
- b. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c. Adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.

- d. Accurate and, where necessary, kept up to date.
- e. Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- f. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6. Applications for Disclosure of Images

Requests by individual data subjects for images relating to themselves (Subject Access Requests) should be submitted in writing to the Committee together with proof of identification.

In order to locate the images on the WVH system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

Where WVH is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

A request for images made by a third party should be made in writing to the Committee. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

Such disclosures will be made at the discretion of the Committee, with reference to relevant legislation.

Where a suspicion of misconduct arises, the Committee may access CCTV images for use in staff disciplinary cases.

A record of any disclosure made under this policy will be held by the Committee, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Retention of Images

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.

Where an image is required to be held in excess of the retention period referred to above, the Committee will be responsible for authorising such a request.

Images held in excess of their retention period will be reviewed periodically and any not required for evidential purposes will be deleted.

8. Complaints Procedure

Complaints and appeals concerning the WVH's use of its CCTV system, or the disclosure of CCTV images, should be made in writing to the Committee by email or by post. The complaint will be addressed by the Committee Chairman who will issue an oral or written response within 42 days or within such other period as the Committee Chairman may specify. If the complainant indicates in writing within 14 days of receipt of the response that they are still not satisfied there will be an internal review of the complaint by a sub-committee which shall not include the Committee Chairman.

9. Monitoring Compliance

All Committee members involved in the operation of WVH CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.

10. Policy Review

WVH's usage of CCTV and the content of this policy shall be reviewed annually by the Committee with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

11. Contact Details

Email: enquiries@woodleyvillagehall.com; **Phone:** 07536399475; **Post:** Woodley Village Hall, School Road, Romsey, SO51 7NY

The central contact will forward your communication to the relevant member of the committee.