

# LONG MELFORD VILLAGE MEMORIAL HALL

Chemist's Lane, off Hall Street, Long Melford, Suffolk CO10 9JQ

**CHARITY NUMBER: 304917**

## CCTV Policy

### Introduction

Long Melford Village Memorial Hall is a registered charity, number 304917. CCTV is installed at the Hall.

This policy sets out the systems and procedures in place to ensure the effective management, use and operation of the CCTV system in compliance with the charity's obligations under The Data Protection Act 2018 (DPA) and The General Data Protection Regulation 2018 (GDPR). The Policy reflects the guidance provided by the Information Commissioner's Office (ICO) Data Protection Code of Practice for surveillance cameras

(<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>).

### Purpose and objectives

1. The purpose of the CCTV system is to protect the charity's premises, assets and other interests and provide a safe and secure environment for volunteers, staff, hirers, visitors and the general public, by: deterring and discouraging criminal and anti-social behaviour;
2. encouraging compliance with the terms and conditions for hire of the hall;
3. encouraging compliance with the parking regulations; and
4. in the event of a crime, facilitating the investigation and prosecution of the offenders.

### Governance

The Data Controller and Data Processor for the CCTV is the Management Committee of Long Melford Village Memorial Hall.

As an organisation processing personal information, the Management Committee pays the Information Commissioner's Office annual Data Protection Fee.

The Management Committee designates one of its members as CCTV Manager who is responsible for overseeing the use of the CCTV equipment. The CCTV Manager is appointed each year at the first meeting after the AGM for the period until the end of the next AGM.

NB. The Management Committee are not responsible for, and this policy **does not cover**, any CCTV equipment owned and operated by the **Long Melford Heritage Trust** at their Heritage Centre which is located in part of the Village Hall's premises.

### Camera locations and fields of view

The CCTV cameras are located as follows:

- On the northeast corner of the Hall, facing the entrance steps and slope
- On the southeast corner, facing north along the roadway
- On the southern wall, facing south across the car park area
- On the northwest corner facing the backdoor steps and the car park
- Inside the hall facing the bar area

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All cameras are publicly visible and clearly marked as CCTV devices. The cameras do not capture audio data. The fields of view of the external cameras are restricted to ensure that images include only the village hall land and premises. The field of view of the internal camera is restricted to ensure that images include only the bar and the area of the main hall immediately adjacent to the bar counter.

## **Signs and notices**

Signs indicating that CCTV is in operation are located around the premises.

A **CCTV Notice** (see below) and **Privacy Notice** are displayed on the internal and external noticeboards. They are also available from the Village Hall's website.

The **Hirer's Agreement** includes a notice that CCTV is in operation on the premises, and information on locating the **CCTV Notice** and **Privacy Notice**.

## **Recording Equipment**

The recording equipment is located in a secure cabinet in the kitchen. The keys to the cabinet are held only by the Premises Manager of the Management Committee / CCTV Manager.

The recording equipment is configured to record 12 high definition images per second from each of the cameras.

The Committee believes that any event or circumstance requiring further investigation by review of the CCTV images would come to light within 1 month. Images more than 1 month old are therefore deleted. In addition, when the available capacity of the recorder is reached, the oldest images are overwritten.

## **Monitor**

A monitor is located in the secure cabinet. If the Committee or a hirer has concerns regarding the possibility of nefarious activity at a particular event, the monitor can be relocated to the kitchen area, in a position where it can be seen from within the kitchen but not (via the hatch) from the main body of the hall.

The monitor is activated only:

1. for viewing live images during an event, if requested by a hirer and agreed by the Lettings Secretary
2. for viewing live images to ensure that the cameras are not obscured and remain in the correct alignment
3. for viewing recorded images to ensure the correct operation of the recording equipment
4. for viewing recorded images in order to fulfil a Subject Access Request
5. for viewing recorded images to investigate particular events

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## **Remote Access**

The system is connected to the internet in order to enable it to be accessed remotely and/or to provide alerts when movement is detected in key areas at unexpected times. This facility is activated only for use by the CCTV Manager to facilitate viewing in the same circumstances as above.

## **Access to the system and images**

The **Chair of the Committee** and the **CCTV Manager** are the only individuals routinely permitted to access the CCTV system or to observe recorded images. They may at their discretion permit other committee members to observe particular images in order to aid the investigation or interpretation of a specific event or incident.

A check is undertaken at least once every week to confirm:

1. Each camera continues to provide images.
2. The field of view of each external camera remains restricted to the village hall's land and premises.
3. The field of view of the internal camera remains restricted to the bar and area of the main hall immediately adjacent to the bar counter.
4. The images are not obscured (eg. dirt, spiders, etc)

A check is undertaken at least once every month to confirm:

1. The images are being recorded, can be played back, and are of suitable quality.
2. The date and time on the system is correct.
3. Any updates to the firmware of the system are applied.

Images are accessed (whether via the monitor or remotely) **only**:

1. to test the equipment as indicated above
2. to investigate specific events when it is reasonably believed that there might have been criminal activity, antisocial behaviour and/or a breach of the hall's terms and conditions of hire or parking regulations
3. to fulfil a Subject Access Request
4. at the request of the police as part of a criminal investigation

## **Disclosure of Images**

Copies of images are made **only**:

1. to preserve the images pending further investigation of the relevant incident
2. to provide copies of the images to fulfil a Subject Access Request
3. to provide copies to the police as part of a criminal investigation

A log is maintained to record every occasion when images are copied, including details of the person(s) to whom the copy is provided.

Where copies are provided to the police, a written receipt is obtained, confirming that the recipient takes responsibility for the protection of those images and assumes the role of Data Controller for them.

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Where copies are provided to a Data Subject as part of a Subject Access Request, a written receipt is obtained confirming that the recipient takes full responsibility for the protection of the images.

Once copies have been provided, and a receipt obtained, the hall's copy of the images is deleted within 3 months.

## **Subject Access Requests**

All Subject Access Requests are passed to the CCTV Manager, who maintains a log of all such requests.

The CCTV Manager liaises with the requester to determine the date(s), time(s) and location(s) at which they believe their data has been captured by the CCTV system.

The CCTV Manager reviews the relevant recordings to determine whether the images include the requester.

The CCTV Manager assesses the images arising from any subject access request to determine whether third parties can be identified. If so, the CCTV Manager assesses, in light of the nature and context of the images, whether to obscure the third parties' identities.

The CCTV Manager ensures that Subject Access Requests are fulfilled or refused within one calendar month of the request. If relevant images are found, the requestor is offered the option to view the images on the monitor in the hall. If the requestor chooses, the images can be copied to a USB Memory Stick (which can be provided for an administration fee of £10).

Anyone submitting a Subject Access Request who is unhappy with the hall's response has a right to appeal to the Information Commissioner's Office.

## **Complaints**

Complaints regarding the management, use and operation of the CCTV system should be sent to the Chair of the Management Committee.

All complaints are considered by the full committee at the next meeting.

The chair will write to the complainant regarding the outcome of their complaint within 10 days of the meeting.

Complainants are advised that they also have a right to complain to the Information Commissioner's Office.

## **Review**

This policy will be reviewed every **3 years** by the Management Committee.

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## CCTV Notice

These premises are protected by CCTV. The system is operated by the **Management Committee of Long Melford Village Memorial Hall** to protect the charity's premises, assets and other interests and provide a safe and secure environment for volunteers, staff, hirers, visitors and the general public. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

The use of CCTV falls within the protection of personal information provided by the Data Protection Act 2018 and the General Data Protection Regulation 2018. The Management Committee is the Data Controller and Data Processor for the system and pays an annual Data Protection Fee to the Information Commissioner's Office.

The policy and procedures for the CCTV system reflect the guidance provided by the Information Commissioner's Office (ICO) "Data Protection Code of Practice for surveillance cameras" (<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>). Specifically:

- Notification has been made to the Information Commissioner and the next renewal date recorded.
- There is a named individual who is responsible for the operation of the system.
- The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision is reviewed on a regular basis.
- A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system if required.
- Cameras have been sited so that they provide clear images. The CCTV cameras are all visible and clearly identified. There are no covert cameras.
- Cameras have been positioned to avoid capturing the images of persons not visiting the premises.
- There are visible signs indicating that CCTV is in operation. Our contact details are provided above.
- Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.
- The recorded images are only retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.
- Except for law enforcement bodies, images will not be provided to third parties.
- The potential impact on individuals' privacy has been considered in the use of the system.
- We know how to respond to individuals making requests for copies of their own images and if unsure we know to seek advice from the Information Commissioner as soon as such a request is made.
- Regular checks are carried out to ensure that the system is working properly and effectively.

The lawful basis for collection of CCTV images is **Legitimate Interests**. A full copy of our Privacy Notice for the CCTV system can be obtained from our website <https://www.longmelfordvillagehall.co.uk>.

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## **Your rights**

You are entitled to request a copy of CCTV images in which you appear. Requests should be made in writing to the **CCTV Manager**. Requests will be acknowledged upon receipt and fulfilled within the statutory maximum period of one month. You may view the images by arrangement free of charge. Copies of the images can be transferred to a USB Memory Stick you provide free of charge. We can provide a USB Memory Stick for a £10 charge.

If you are unhappy with the manner in which your request is fulfilled, or any other aspect of the operation of the system, you can complain in writing to the Chair of the Management Committee. Your complaint will be discussed by the Committee at its next meeting (which are held every 2 months) and you will be advised the outcome of your complaint. If you are not satisfied with the outcome you can complain to the Information Commissioner's Office.