



HILTINGBURY COMMUNITY ASSOCIATION

Registered Charity Number - 1089482

CCTV Policy

1. Introduction

This policy reflects The Hilt's commitment to meeting its legal duties with respect to the operation of its CCTV system. The purpose of this policy is to outline the requirements which must be adhered to, and to detail how the Hilt proposes to be compliant with the appropriate legislation covering this area.

Images of people are covered by the Data Protection Act, and so is information about people which is derived from images – for example, vehicle registration numbers.

2. Requirements

- The CCTV system must be registered with the ICO (Information Commissioner's Office) stating the reason why it is needed, e.g. security, safety etc.
- The storage device must be kept in a locked room as images are usually targets of break-ins (eg. to remove evidence).
- There must be an external notice which needs to state who the system is operated by, in the case of the Hilt, "The CCTV system is operated by the Hiltingbury Community Association with postal address: The Hilt, Hiltingbury Road, Chandlers Ford, Eastleigh, Hants, SO53 5NP, Telephone Number 02380 271609".
- An Internal documented procedure should be in place, this should include or state:
 - Who has access to the footage from the system (Manager, Asst Manager, Chairman, one Trustee).
 - As the system can transmit images over the internet (eg, to allow viewing from a remote location) the Hilt should ensure that these signals are encrypted to prevent interception and also require some form of authentication for access (eg, a username and secure password).
 - It should confirm that conversations are not recorded.
 - A Control Log should be established and maintained (this can be electronic, e.g. Excel or word): this should show records of access to recordings including: Who, When, Purpose, Result.

- The Control Log should state how long 'saved' recordings are retained or archived, there needs to be a valid reason for retention (such as unresolved issue, insurance claim pending, police and prosecution action pending).

3. Subject access requests

- A Subject Access Request (SAR) is a right that consumers have under the Data Protection Act 1998 to obtain from any company the information that is held about them by that company. The 'subject' or 'data subject' refers to the consumer. Users of the Hilt may make a written request for the information.
- The HCA Centre Manager will ensure that HCA Trustees, staff and Volunteers are aware of what a Data Subject Access Request (DSAR) is and the importance of immediately passing such requests to the Data Controller or relevant member of team.
- HCA Staff should be aware that request does not need to be formerly called a "subject access request" or "access request" for it to constitute one, and they will rarely be entitled as such.
- Also that a request could be sent to any HCA representative and come from a variety of sources. Individuals do not need to officially write a letter addressed to the Data Protection Office for it to be a valid request. They might be submitted by email or social media and may be addressed to the "wrong" department or person.
- The request does not have to be in any particular form. Unless a SAR relates to one of a small number of special categories of information, the maximum fee you can charge for dealing with it is £10.
- HCA must respond to requests promptly and in any event within 30 calendar days of receiving it.
- Acknowledgment of request should be within a shorter period of 7 days, using the HCA acknowledgement request reply template, this will include wording for additional information if required (such as proof of identification from the requester if this has not been provided in the initial request), and if appropriate ask for additional information at the same time.
- Identification may be required to prove relationship/authority (for example if information is requested about a child or by an agent).
- The acknowledgement template will also include wording to ascertain whether the requester is interested in specific information, this will help narrow down the search parameters.
- In addition, the HCA Centre Manager or data Controller may need to request a photograph, description of clothes worn, dates of visits etc.
- In responding to subject access requests or other disclosures, an appropriate format of the data to be disclosed, and appropriate security controls should be in place as will the capability of the device or prospective system to export data securely to third parties.
- The HCA Centre Manager or Data Controller may need to seek advice from the police or other appropriate parties to confirm ability to share any footage if other people can be seen in it or we are not able to edit out people to protect their identity.
- HCA can invite the Requester to a viewing of the footage if: we are unable to provide the footage itself or if the requester agrees with that arrangement.

- HCA can refuse requests if sharing the footage will put a criminal investigation at risk.
- When sending out the final response from HCA, the HCA Centre Manager or Data Controller should use the response template.
- The HCA Centre Manager will be responsible for checking the CCTV system to ensure the deletion of retained CCTV footage on a regular basis.

3.1 Information, Instruction and Training for SAR

- HCA should have a specific person or central team to be responsible for responding to requests.
- More than one member of staff should be aware of how to process a SAR so there is resilience against absence.
- In case requesters are dissatisfied with the initial response, arrangements are in place for a senior manager to review them.

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Approved by Trustees June 2019