



## **SOUTH WOODHAM FERRERS TOWN COUNCIL**

### **Champions Manor Hall Community Centre CCTV Policy**

In line with the CCTV Code of Practice 12<sup>th</sup> January 2022 (Information Commissioner's Office)

The use of CCTV for Champions Manor Hall Community Centre is covered by the Data Protection Act 1998. Data Protection registration number: Z5194667.

All Town Council staff are trained in the use of the CCTV system. Each member of staff has knowledge of this policy for recording and retaining images.

All images are handled securely.

The Town Clerk and Office Administrator responsible for the Community Centre have the facility of viewing live images only off site. This is to ensure that the site is effectively monitored out of hours.

The system is password protected only known to employees of the Town Council.

#### **Storage**

The Town Clerk is responsible for the control of images and makes decisions on how these can be used.

All images are stored on the internal hard drive.

Recorded images are viewed in a restricted office (the Town Council office) and viewing is restricted to authorised persons.

#### **Disclosure**

Requests for images, including law enforcement agencies, are approached with care and in limited circumstances it may be appropriate to release to third parties.

Records are kept of the date of the disclosure along with details of who the images have been provided to and why they are required.

The Town Council has the discretion to refuse any request for information unless there is an overriding legal obligation such as a court order.

Disclosure of images is secure and they are only seen by the intended recipient.

Once images are disclosed to another body, such as the police, then they become the data controller for their copy of that image. It is their responsibility to comply with the Data Protection Act (DPA) in relation to any further disclosures.

#### Retention

Images are stored for a period of 30 days and are automatically deleted after this period.

Regular checks are carried out to ensure that the retention period is being adhered to.

Required images relating to incidents can be retained for the purpose of investigating a crime.

#### Responsibilities

Prominently placed signs are situated in the car park, entrance to Champions Manor Hall and the foyer of the Community Centre informing members of the public that surveillance is being carried out.

#### Subject Access Requests

All subject access request details and the way they are dealt with are logged.

Individuals are required to supply either a photograph of themselves or a description of what they were wearing to aid identification and the request must also include details of the date, time and location of the images required.

If the image requested shows images of third parties, these will be obscured if deemed necessary.

If this necessary, work is contracted to another organisation then a written contract will be requested with the processor to specify exactly how the information is to be used and provides explicit security guarantees.

#### Freedom of Information

The Town Council complies to the Freedom of Information Act 2000 (FOIA) and the Town Clerk is responsible for responding to freedom of information requests.

If a request is received for CCTV footage then the Town Clerk will consider if:

- The images are of those of the requester, if so, then the information is exempt from the FOIA and the request is treated as a data protection subject access request as detailed above
- The images are of other people, these can only be disclosed only if disclosing the information in question does not breach the data protection principles

This policy is reviewed annually along with the system's effectiveness. All results of the review are recorded and any conclusions acted upon.