



Trinity Fields Trust

CCTV Data Protection Policy

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Version 1

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1.0 General

1.1 Trinity Fields Trust uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the buildings in order to provide a safe and secure environment for users, and to prevent the loss or damage to property.

1.2 CCTV surveillance at Trinity Fields is intended for the purposes of:

- protecting the buildings and assets, both during and after opening hours;
- promoting the health and safety of staff and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the Police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that rules are respected so that Trinity Fields Trust can be properly managed.

1.3 The system comprises of a number of 3 fixed cameras at the Beechcroft Road Pavilion site and one camera at the Trinity Road end.

1.4 The CCTV system is owned and operated by Trinity Fields Trust and the deployment of which is determined by the management. The CCTV is a standalone system and operated by the Trust.

1.5 The CCTV is monitored from a Ring app by the General Manager on a secure mobile phone with passcodes.

1.6 The CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the Trust's use of CCTV and how it complies with the Act.

1.7 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1.8 The Trust complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

1.9 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

2.0 Justification for Use of CCTV

2.1 The use of CCTV for security purposes has been deemed to be justified by the Trustees. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation or of antisocial behaviour.

2.2 The use of CCTV is a requirement of the Alcohol Licence for the sale of alcohol.

3.0 Data Protection Impact Assessments

3.1 Where new CCTV systems or cameras are to be installed, the Trust will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation.

3.2 Where existing CCTV systems are in operation as of May 2022, the Trust will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system or within a 3 year period from the date of the implementation of GDPR, whichever is sooner.

4.0 Location of Cameras

4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

4.2 The Trust will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The Trust will make every effort to position cameras so that their coverage is restricted to the site, which may include outdoor areas.

4.3 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. The Trust has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

4.4 Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

4.5 CCTV Video Monitoring and Recording of Public Areas may take place for the following purposes:

- Protection of buildings and property: The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas.
- Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms.
- Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control
- Criminal Investigations (carried out by police): Robbery, burglary and theft surveillance

5.0 Covert Surveillance

5.1 The Trust will not engage in covert surveillance.

6.0 Notification

6.1 A copy of this CCTV Policy will be provided on request to staff, users and visitors to the site and will be made available on the Trust website.

6.2 Adequate signage will also be prominently displayed and shall include the specific purpose(s) for which the CCTV camera is in place in each location.

7.0 Storage and Retention

7.1 The images captured by the CCTV system will be retained for a maximum of 42 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

7.2 The images/recordings will be stored in a secure environment with a log of access kept.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the General Manager. The General Manager may delegate the administration of the CCTV System to another staff member.

7.4 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7.5 Files/Tapes/DVDs will be stored in a secure environment with a log of access to tapes kept. Access will be restricted to authorised personnel.

8.0 Access

8.1 Access to the CCTV system and stored images will be restricted to authorised personnel only.

8.2 When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept.

8.3 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.4 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

8.5 In relevant circumstances, CCTV footage may be accessed:

- By the police where Trinity Fields Trust (or its agents) are required by law to make a report regarding the commission of a suspected crime; or

- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on The Trinity Fields Trust property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the General Manager in establishing facts in cases of unacceptable behaviour; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the Trust's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

9.0 Subject Access Requests (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

9.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

9.3 The Trust will respond to requests within 30 calendar days of receiving the request in line with the right of access policy.

9.4 The Trust reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

9.6 In giving a person a copy of their data, the Trust provides a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

9.7 Where footage contains images relating to 3rd parties, the Trust will take appropriate steps to mask and protect the identities of those individuals.

10.0 Complaints

10.1 Complaints and enquiries about the operation of CCTV should be directed to the General Manager in the first instance.

11.0 Staff Training

11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.

11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

12.0 Responsibilities

12.1 The General Manager (or nominated deputy) will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Trinity Fields Trust.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both users and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”.
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc.
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas.