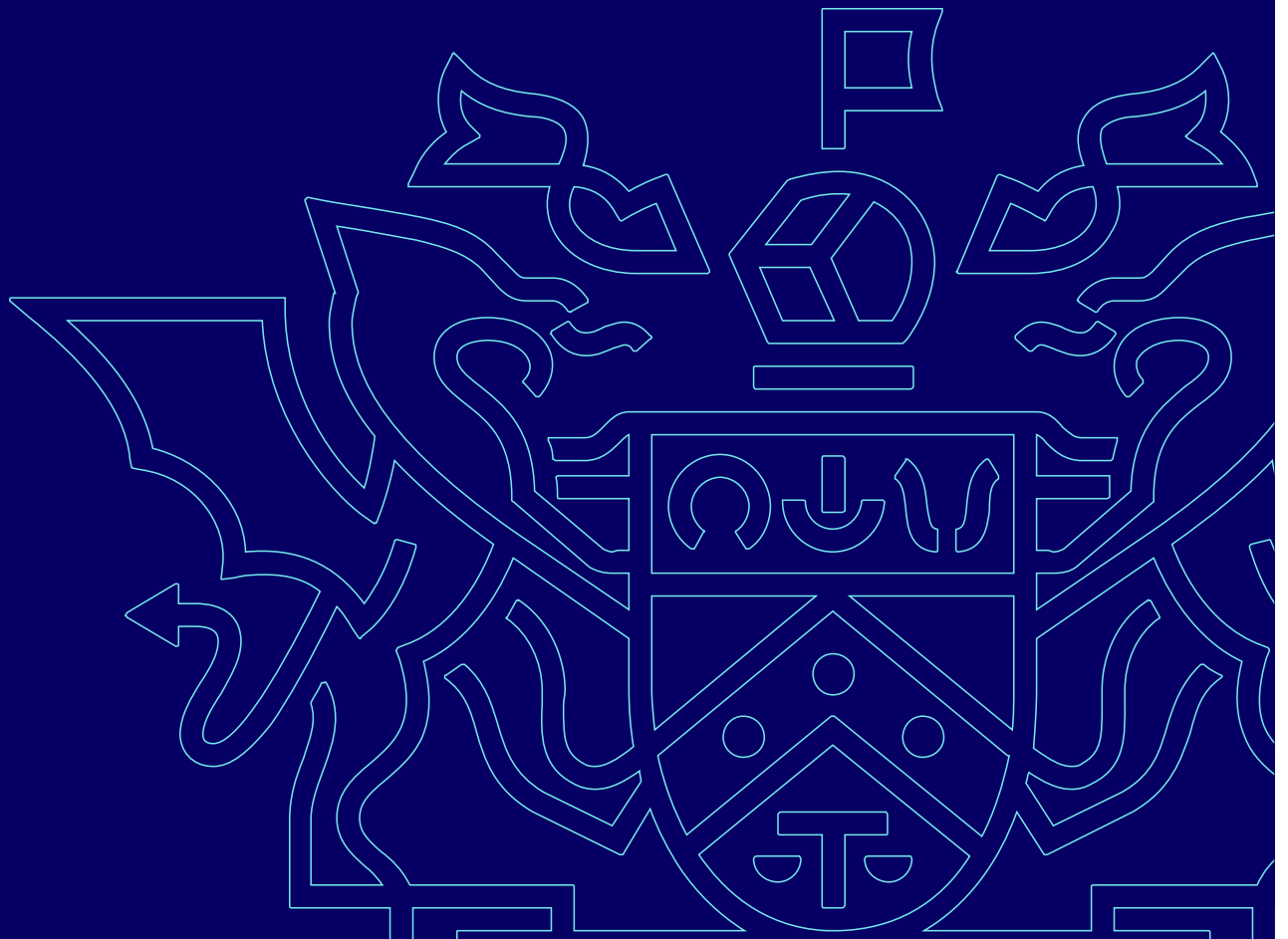


CIM

CS001 CCTV Policy



POLICY TITLE	CCTV Policy		
POLICY VERSION	V2	POLICY REFERENCE	CS001
REVIEWED DATE	April 2022	NEXT REVIEW DUE	April 2023
POLICY OWNER	Director of Strategy & Planning	RISK REGISTER	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
		STAFF INDUCTION	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No

Version history			
Version	Revision date	Description of change	Approved by
V1	April 2018	Initial launch	SMT
V2	April 2022	Rewritten in full	SMT

Overview

This policy aims to regulate the management, operation and use of the closed-circuit television (CCTV) system operating across the Moor Hall site.

The system is owned and operated by CIM who acts as the Data Controller for all images and personal data captured by the system under its registration with the Information Commissioner's Office (ICO): Registration Number Z5275775.

CIM's CCTV activities will adhere to the requirements of the Data Protection Act 2018, the UK GDPR and any subsequent data protection legislation, along with the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998.

Purpose of CCTV

CIM is committed to operating a safe environment across the Moor Hall site. We therefore have in place a CCTV system for the purposes of:

- Increasing the personal safety of employees, customers and visitors and reducing the fear of physical abuse, intimidation and crime.
- Protecting Moor Hall buildings and other assets to ensure they are kept free from intrusion, vandalism, damage, theft or disruption.
- Assisting in the prevention and detection of crime.
- Supporting the Police in the identification, apprehension and prosecution of offenders.
- Assisting with the identification of actions or behaviours that may result in disciplinary proceedings against employees or members of the institute.

Any changes to or development of the system will comply with this policy and the Chief Data Officer will regularly review its use to ensure this remains justified, necessary and proportionate.

Scope

This policy relates to CIM employees, customers and visitors to the Moor Hall site whose image(s) may be captured by our CCTV system. It covers the use of CCTV in external areas and the viewing and sharing of images internally and with third parties for the purposes of safety, security and crime prevention.

Operation

- The CCTV system is in operation 24 hours a day, 7 days a week.
- All cameras are visible in prominent positions within view of public and employees, and do not infringe on sensitive areas such as private offices, toilets or changing areas. Cameras are located in the following areas:
 - Driveway
 - Barrier
 - Reception
 - Bar
 - Print room door
 - Arch
 - Entrance gate
 - Gatehouse gate
 - Kitchen
 - Car Park A
 - Road between Car Parks A & B
 - Hotel
- Internal and external signage is clearly displayed indicating the operation of CCTV for the purposes of crime prevention and individual safety.
- Cameras do not view inside private homes, gardens or other areas of private property.
- The images captured by the system will be of a quality that is effective for the purposes for which they are intended. All equipment is maintained regularly to ensure the footage is fit for these purposes.
- Covert CCTV will only ever be set up for the detection or investigation of crime or serious misconduct where the investigator has a reasonable suspicion that the crime or misconduct is taking place and where the use of CCTV is deemed to be a proportionate means of securing evidence.
- The design of the CCTV system is intended to provide maximum effectiveness and efficiency, but it is not possible to guarantee that the CCTV will cover or detect every single incident within the areas of coverage.

Retention

All images are digitally recorded, stored securely and erased by automated system overwriting. Images which are not required for the ongoing purposes for which the system is in place will not be retained for longer than is necessary and for no longer than one calendar month, with access limited to only authorised individuals.

Where footage is required for evidential purposes or disciplinary proceedings, a copy of the file may be transferred to another secure, confidential, restricted-access location and retained until completion of the investigation.

Images are stored securely in line with current legislation. This ensures the integrity of any images is maintained to protect their evidential value or to protect the privacy rights of any individuals whose image has been captured.

Access and disclosure

Access to and disclosure of images is permitted only if it supports the purpose for which the images were captured.

Access to images from the CCTV system is restricted and carefully controlled to ensure the rights of individuals are preserved and the continuity and integrity of images is maintained should they be required for evidential purposes.

Access is restricted to the Chief Data Officer, the HR Operations Manager and the Central Services Manager. Additional access may be delegated or granted by the Chief Data Officer.

All requests for disclosure will be documented and, if denied, the reason will be recorded.

Requests should be made using the Subject Access Requests form (see Appendix 1) and submitted in writing to the Chief Data Officer at CIM, Moor Hall, Cookham, Maidenhead, Berks SL6 9QH or via mydata@cim.co.uk.

Access by individuals

Data protection law gives any individual the right to request access to CCTV images which contain their personal data. Requests should be made using CIM's Subject Access Request form to ensure that CIM has all the necessary information to locate the relevant images, and to allow CIM to satisfy itself that the individual making the request is the Data Subject of those images.

Information required shall include the reason for the request, the date, time and location of the recording, a recent photo of the data subject and proof of identity.

On receipt of a Subject Access Request, the Central Services Manager (or another individual authorised by the Chief Data Officer) shall determine whether disclosure is appropriate and whether providing the images would involve an unfair intrusion into the privacy of any third party or cause unwarranted harm or distress to a third party. If CIM's duty of care to protect these third parties cannot be discharged (such as through editing to blur or disguise the third party) then the request can be refused.

If the services of an editing company are required, the Central Services Manager will put in place a contractual relationship between the organisations. This ensures appropriate technical and organisational measures are in place for maintaining the confidentiality of the personal data and that the data is only processed in accordance with CIM's instructions in line with the legal requirements for data processors.

A written response will be made to the individual, giving the decision (and if refused, the reasons for the refusal) within 30 days of receipt of the request. If permitted, images will be made available to the individual within 30 days. However, if the request involves particularly large amounts of data, this period may be extended to three months.

Access by third parties

Unlike data subjects, third parties who wish to access CCTV images (i.e. images of someone other than the individual making the request) do not have a right of access in law. Disclosure of recorded images will therefore only be made in limited and prescribed circumstances.

In case of the prevention of the prevention and detection of crime, disclosure to third parties will be limited to:

- Law enforcement agencies, where the images would assist in a specific criminal enquiry.
- Prosecution agencies and their legal representatives.
- Insurance companies and their legal representatives.

- The media, in cases where it is decided by a law enforcement agency that the public's assistance is needed to identify a victim, witness or perpetrator in relation to a criminal incident. This decision will be made by the Chief Data Officer in consultation with the law enforcement agency and taking into account the wishes of the victim.

Recorded images will not be made more widely available and will not be made routinely available to the media. No recorded material will be sold, used for commercial purposes or for the provision of entertainment.

Where images have been viewed or removed by a third party, the following details must be documented internally:

- The date and time of the viewing or transferal of the images
- The reason for the viewing or transfer
- The name and signature of the individual(s) viewing or transferring the images
- The name of the recipient(s) of any transferred images
- The crime incident number (if applicable) to which the images are relevant

Enforcement

Any breaches of this policy will be investigated by the Central Services Manager and where a serious breach occurs this will be escalated to the Chief Data Officer and the Senior Management Team. All staff with access to the CCTV system will be subject to disciplinary procedures for breaches of confidentiality, and non-compliance will be treated as gross misconduct.

The ICO has the right to bring enforcement actions against companies where it considers that there has been a breach of one or more of the data protection principles within law.

If you have any concerns or complaints regarding this policy or the use of your personal data within our CCTV system, please contact us at: Chief Data Officer, CIM, Moor Hall, Cookham, Maidenhead, Berks SL6 9QH or via mydata@cim.co.uk.

Please visit www.cim.co.uk/privacy for more information about how CIM processes personal data.

You also have the right to make a complaint to the ICO. Further information can be found at www.ico.org.uk.

Related documents & other references

Document	Owner
Subject Access Request Form – CCTV (see Appendix 1)	Central Services Manager
Privacy Policy	Chief Data Officer

Appendix 1: Subject Access Request Form – CCTV

Under the terms of the UK General Data Protection Regulation (UK GDPR), Data Subjects have the right to request access to CCTV images which contain their personal data.

To assist us in locating the data, please complete the details below:

Section 1:	Your personal details
Surname/Family name	
First name	
Present address (including postcode)	
Telephone number	
E-mail address	
CIM membership number (if applicable)	
Section 2:	Are you the Data Subject?
Are you requesting information about yourself?	<p>If yes, you are the Data Subject.</p> <ul style="list-style-type: none"> - Please supply documentary evidence of your identity, i.e. photocopy of a driving licence or birth certificate and a recent and clear photograph of yourself. Please go to Section 4. <p>If no, are you acting on behalf of the Data Subject with their express permission or with the appropriate legal authority?</p> <ul style="list-style-type: none"> - If so, please supply the written consent of the Data Subject, along with a receive and clear photo of them, and supply their details in Section 3.
Section 3:	Please complete if you are acting on behalf of the Data Subject.
Name of Data Subject	
Their present address (including post code)	
Their email address	
Their telephone number	
Their CIM membership number (if known/applicable)	
Section 4:	Details of the data being requested

Please describe the information you seek together with any other relevant information to help us identify the information you require	
Please briefly explain why you are requesting this information	
Date on which the requested image(s) were taken	
Time at which the requested image(s) were taken	
Location of the Data Subject at the time the image was taken	
Please supply a photograph of the Data Subject with your application to enable the correct images to be located.	
If requesting on behalf of the Data Subject, please also provide written consent from the Data Subject to allow their images to be accessed and disclosed.	
Please note that CCTV images are only stored for up to one calendar month unless they form part of an ongoing criminal or disciplinary investigation.	

On receipt of a fully completed application, a response will be provided as soon as possible and in any event within one calendar month, although in some cases, particularly where large amounts of data is processed, that time period may be extended to three months.

Please note that CIM may need to request further information from you in order to locate the data that you are requesting or to verify your identity.

Declaration

Please sign to confirm that the information you have given on this Subject Access Request form is true. By signing this document, you are agreeing to allow CIM to search for relevant data.

Signature:

Date:

Please return your completed form to the Chief Data Officer at CIM, Moor Hall, Cookham, Berkshire, SL6 9QH or via mydata@cim.co.uk.
