



Filby Playing Field Committee

CCTV Policy



Closed circuit television (CCTV) is installed at Filby Village Hall.

The CCTV Scheme is registered with the Information Commissioners Office, and its images are governed by the General Data Protection Regulation (GDPR).

This document details the policy and procedures used to control the management, operation, use and confidentiality of the CCTV system. This policy is subject to annual review by the Trustees of Filby's Playing Field Committee, at its A.G.M., to ensure that it continues to reflect the public interest and that it and the system meets all legislative requirements.

Filby Village Hall CCTV System

The system, installed in 2015, comprises of the following items, supplied by the world's leading supplier of CCTV systems, Hangzhou HiKVision Digital Technology Co. Ltd., of China...

- 1 x NVR IP 6TB Data Storage System (hard disk recorder)
- 7 x vandal proof cameras, all varifocal, infrared (for operation in darkness), 2MP. Six of the cameras observe the hall exterior. One camera observes the interior – it is positioned on the South wall of the main hall, facing the stage. None of the cameras are positioned to observe toilet facilities or changing rooms.
- 1 x HD monitor

All are full IP HD 1080p quality. The facility has no audio recording capability. Images are recorded digitally and stored automatically for up to 4 weeks on a hard disk drive.

The system was installed by VocalVale Ltd. (2,Yarmouth Road, Hemsby, Great Yarmouth, Norfolk, NR29 4NJ, 01493 732 575, vvsecurity@btconnect.com, <https://www.vocalvaleltd.co.uk/>) who continue to maintain the system and act as system administrators.

The recording equipment is positioned in a secure cabinet alongside equipment of the Hall's Audio Visual facilities. In order to access the latter, hirers are issued with a key to the cabinet. However, access to the CCTV recorder is password protected.

Authorised access to operation of the recorder is limited to the Committee's Data Protection Officer (DPO) or his designated representative. There is no live access to the cameras. This can only be restored by the system administrators.

The DPO has access to recorded images, only. This data is encrypted and, if copied to a USB memory stick, or similar, is capable of being viewed, only on equipment pre-loaded with a dedicated decoding software package.

There is no internet connection to the CCTV system and, therefore, no offsite access. Again, this can only be restored by the system administrators. This has been disconnected to eliminate any possibility of the system being hacked by outsiders. Recorded video is the only equipment output.

Signage

It is a legal requirement to have prominent signage in areas where CCTV cameras are operating. A minimum requirement is one sign both front and back of the building. We have two A4 signs, there. In addition, there is a sign on the gates to the Hall Car Park. A5 signs are displayed on all of the external glass doors and the internal glass doors to the Main Hall.

Maintenance

The CCTV system is serviced annually and maintained as necessary by an appropriate security system contractor (currently VocalVale Ltd).

CCTV Data Processing

Our reasons for processing CCTV data include...

- To maintain the security of the premises.
- The prevention and detection of crime, safeguarding volunteers and users.
- Ensuring compliance with health and safety procedures, and improving productivity.
(By way of explanation of our meaning of productivity, the system is occasionally used to review damage caused to the building to assess the need for corrective action.)
- To assist Law Enforcement Agencies to carry out their lawful duties.

Lawful basis for processing

The CCTV system is used in accordance with Filby Village Hall's Data Protection Policy, in order to carry out its day to day operations, to meet its objectives and to comply with legal obligations.

Filby Village Hall Committee's lawful basis for using video surveillance is the legitimate interest of protecting the assets of the organisation. Reasons for processing CCTV data include asset protection, the prevention and detection of crime, safeguarding volunteers and users, ensuring compliance with health and safety procedures, and improving productivity.

The Committee of Filby Village Hall has responsibility for the control of images and decisions on how the CCTV system is used. Images will only be used for the Committee's lawful purposes and will never be released for use for advertising purposes or for use on social media.

Day-to-day operational responsibility rests with the Committee's DPO or another committee member nominated by the DPO.

Image storage and disclosure

Recorded images will be stored in a way that ensures the security and integrity of the image and allows specific times and dates to be identified. Normally, images will not be retained for longer than 4 weeks.

On occasion images may need to be retained longer where, for example, an incident has been identified and an access request has been made, or time is required to enable the police to collect relevant images, or the police are investigating a crime and ask for images to be preserved to afford them the opportunity to view the information as part of an active crime investigation.

Disclosure of information will be controlled and consistent with the purpose(s) for which the system is established. Once information is disclosed to the police or any other law enforcement body, they will become data controller for the copy they hold.

The Playing Field Committee recognises that the rights and freedoms of its users and volunteers cannot be ignored, especially in the case of legitimate interests. All have a right to privacy.

Subject Access Request (SAR)

Requests for access regarding CCTV footage, are to be made by email (filbyvillagehall@btinternet.com) or in writing to Filby Playing Field Committee, providing sufficient detail for the images on the system to be readily accessed, including date, time and location. Requests regarding any other data should be made in accordance with the Data Protection Policy. Any SAR must be dealt with within 30 days.

Steps must first be taken to confirm the identity of the individual before providing information, requiring both photo identification e.g. passport and confirmation of address e.g. recent utility bill, bank or credit card statement.

All requests for access are recorded. If disclosure is denied, the reason is documented and the individual will be informed within 30 days of the request and their right to complain to a statutory authority.

A fee may be charged for an access request, depending on circumstances.

Signed for and on behalf of Filby Playing Field Committee...

Chairman

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Secretary

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J.V. Baldry

Date

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31/7/2020