

# Shrivenham Memorial Hall and Pavilion

## CCTV Code of Practice

### 1 Introduction

1.1 This policy is to control the management, operation, use and confidentiality of the CCTV system at Shrivenham Memorial Hall, Pavilion, and recreation ground.

1.2 It has been prepared taking due account of the Code of Practice published by the Data Protection Commissioner (July 2000) and Data Protection Act (2018).

1.3 This policy will be subject to periodic review by Viscountess Barrington Trust to ensure that it continues to reflect the public interest and that the system meets legislative requirements.

1.4 The system comprises of 14 cameras located on the exterior of the Memorial Hall, Pavilion and partial coverage of the Recreation Ground and are owned by The Viscountess Barrington Trust

### 2. Objectives of the scheme

2.1 To protect the building and its assets.

2.2 To increase personal safety and reduce the fear of crime.

2.3 To support the Police in a bid to deter and detect crime.

2.4 To assist in identifying, apprehending, and prosecuting offenders.

2.5 To protect members of the public and private property.

2.6 To assist in managing Shrivenham Memorial Hall, Pavilion and Recreation Ground.

### 3. Statement of intent

3.1 The Viscountess Barrington Trust will treat the system and all information, documents and recordings obtained and used as data protected by the Act.

3.2 Cameras will be used to monitor activities external of the Memorial Hall, Pavilion and Carpark with partial coverage of the Recreation Ground to identify criminal activity occurring, anticipated, or perceived, and for the purpose of securing the safety of the Memorial Hall, Pavilion and Carpark, together with their visitors.

3.3. Staff have been instructed that cameras are not to focus on private homes, gardens and other areas of private property.

3.4 Shrivenham Memorial Hall, Pavilion and the carpark are fitted with a total of 14 external cameras, 4 PTZ (pan tilt zoom) cameras monitoring the external areas of the Pavilion and car park, 9 PTZ (pan tilt zoom) cameras covering the Exterior of Shrivenham Memorial Hall and 1 PTZ (pan tilt zoom) camera covering the door to the Viscountess Barrington Trusts Garage/Storage area . Cameras will be sited so they only capture images relevant to the purposes for which they are installed. Care will be taken to ensure that reasonable privacy expectations are not violated. The Council will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act (2018).

3.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police. Recordings will never be released to the media for purposes of entertainment.

3.6 The planning and placement of the cameras are positioned to ensure that the scheme will cover the maximum area. However, it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

3.7 Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at all access routes to areas covered by the CCTV.

## **4 Operation of the system**

4.1 The Scheme will be administered and managed by the Viscountess Barrington Trust Staff, in accordance with the principles and objectives expressed in the code.

4.2 The day-to-day management will be the responsibility Shrivensham Memorial Hall Facilities Manager and Parish Clerk.

4.3 The CCTV system may be operated 24 hours each day, every day of the year.

## **5. Maintenance**

5.1 Shrivensham Memorial Halls Facilities Manager will routinely check and confirm the efficiency of the system and, in particular, that the equipment is properly recording and that cameras are functional.

5.2 Access to the CCTV recordings will be strictly limited to this group and for training purposes.

5.3 Unless an immediate response to events is required, the authorized personnel must not direct cameras at an individual or a specific group of individuals.

5.4 Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs.

## **6. Monitoring procedures**

6.1 Camera surveillance may be maintained at all times.

6.2. Images will be continuously recorded and may be remotely accessed by authorised personnel.

6.3 The Viscountess Barrington Trust may, in exceptional circumstances, set up covert monitoring. For example:

- i) Where there is good cause to suspect that illegal or unauthorised actions are taking place, or where there are grounds to suspect serious misconduct;
- ii) Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

6.4 In circumstances of covert monitoring, authorisation must be obtained from the Parish Clerk.

6.5 Covert monitoring must cease following completion of an investigation.

## **7. Storage and Retention of CCTV images**

7.1 Recorded data will be retained for 3 weeks. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

7.2 All retained data will be stored securely.

## **8. Subject Access Requests**

8.1 Individuals have the right to request access to CCTV footage relating to themselves under the stipulations of the Data Protection Act (2018).

8.2 All requests for Data Subject Access should be made in writing to Shrivensham Parish Clerk, preferably on an application form available from the Parish Clerk. The forms will also be available to the public.

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.

8.3 The Parish Clerk will respond to requests within 5 working days of receiving the written request.

8.4 The Viscountess Barrington 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. Access to and Disclosure of Images to Third Parties

9.1 There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the Council where these would reasonably need access to the data (e.g. investigators and CCTV service contractors).

9.2 Requests should be made in writing or via email to the Parish Clerk.

9.3 The data may be used within the Trusts discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

## 10. Review and Compliance

10.1 Copies of this Code of Practice will be available to the public from the Parish Clerk and on the website, <https://www.shrivenhammemorialhall.org/licenses>

10.2 This Code of Practice will be reviewed once a year, or upon revisions of the Data Protection Act or relevant legislation.

10.3 Intention of adherence to this Code is indicated by signature. The Administrative Officer will ensure timely reviews, and signatures from new personnel.

Signed:

Clerk, Julia Evans .....

Administration Officer, Phoebe Keene .....

Facilities Manager, Lewie Hilsdon.....

Date of adoption 01/01/23

# DATA SUBJECT ACCESS (CCTV)

## Shrivenham Memorial Hall, Pavilion and Carpark

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

All requests for Data Subject Access should be made in writing to Shrivenham Parish Clerk on this application form

Name of Applicant	
Address	
Contact (phone/email)	
Date of CCTV footage required	
Time of CCTV footage required	
Location of CCTV footage required	

Shrivenham Parish Clerk will respond to requests within 5 working days of receiving the written request.

Viscountess Barrington 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.