

# Hebden Bridge Community Association

## CCTV Policy

### 1. Introduction

1.1 Any surveillance cameras capture personal data, so the use of CCTV has data protection and privacy implications. The Information Commissioner's Office (ICO) has published a code of practice on the subject and relevant legislation includes the Data Protection Act 1998 (DPA) and Human Rights Act 1998 and General Data Protection Act 2018 (GDPR).

1.2 The Surveillance Camera Code of Practice in the Protection of Freedoms Act 2012 contains 12 guiding principles, which are referenced in the ICO code.

### 2. Purpose of policy

2.1 The purpose of this policy is to ensure that the operation\* of CCTV at Hebden Bridge Town Hall (\*operated by Hebden Bridge Community Association) complies with relevant legislation.

### 3. Policy statement

3.1 We use CCTV at Hebden Bridge Town Hall to support the safety and security of our staff and premises. It will be used to:

- i. act as a deterrent to intruders and to the theft or misuse of property or information;
- ii. act as a deterrent to improper or aggressive behaviour.
- iii. to provide evidence to support the investigation of safety and security related incidents.

3.2 We will not use CCTV for other purposes. Our CCTV does not include audio recording.

3.3 CCTV cameras are sited so that recordings meet the stated purposes. They cover entrances to the premises, the reception area, circulation space and the courtyard, the link bridge to the old building and the car park/ secure storage area.

3.4 We will be transparent in our use of CCTV and we will make all who use the premises aware of its use through appropriate signs and information about our policy.

3.5 We have procedures for operating and accessing CCTV recording equipment, which we communicate to those staff, contractors and third parties who may administer access or operate the equipment or data.

3.6 CCTV recordings and data is classified as confidential information and held in systems with appropriate security measures to safeguard against unauthorised access and use.

3.7 We will ensure that contractual arrangements with any contractors or third party suppliers who may maintain or administer CCTV systems on our behalf cover confidentiality and information security.

3.8 Users will **only** access and view CCTV recordings and data in response to a request authorised by the Director or Facilities Coordinator.

# **Hebden Bridge Community Association**

## **CCTV Policy**

3.9 Access to CCTV systems, recordings and data for the purposes of maintenance or support is restricted to users authorised by the Director and is password protected.

3.10 Information will be stored in a way that allows relevant frames to be isolated to answer a request.

3.11 CCTV information will **not** be disclosed except as necessary for the stated purpose or to respond lawfully to a request under the Data Protection Act or Freedom of Information Act.

3.12 Recordings and data will routinely be held for 6 months and then deleted, unless held as part of an ongoing investigation. Our Premises Licence conditions require a minimum 28 days data is accessible at any one time.

### **4. Application of policy**

4.1 The Director and the Facilities Coordinator are responsible for ensuring all activity for the operation of CCTV at the Town Hall are compliant with this policy and are adhered to by staff, contractors or third parties when operating and accessing CCTV recording equipment.

4.2 Staff, contractors or third parties in IT and facilities will be required to comply with relevant procedures when operating or accessing CCTV equipment.

4.3 The Director or the Facilities Coordinator are responsible for dealing with requests for CCTV footage made under the Data Protection Act or Freedom of Information Act.

4.4 The Facilities Co-ordinator is responsible for communicating this policy to third party individuals and organisations.

4.5 Requests from third parties for footage must follow Data Protection Act or Freedom of Information Act request procedures.

### **5. Measurement and evaluation**

5.1 This policy and related procedures will be reviewed at least annually and in the light of lessons learned from any security incidents.

5.2 The ongoing need and purposes for which CCTV is used (including whether it should be extended or camera locations adjusted) will also be reviewed at least annually and in the light of lessons learned from any incidents.

# Hebden Bridge Community Association

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<b>VERSION CONTROL</b>			
<b>Date</b>	<b>Version Number</b>	<b>Originator</b>	<b>Amends</b>
15 November 2017	Version 1	Rachel Tighe	
16 May 2018	Version 1.1	Graham Mynott	Minor amends to update re GDPR
11 June 2019	Version 1.2	Graham Mynott	Review – no amends
June 2020 & June 2021			NO UPDATES / COVID-19
16 June 2022	Version 1.3	James Cragg	Minor text amends in 1.1 & 3.9