

The Beehive CCTV Privacy Statement and Policy

The Beehive (Honiton Community Complex) (also “we”, “us” and our” in this privacy statement) is a registered Charity (no. 116241), Company no. 08409289. Our address is:

The Beehive
Dowell Street
Honiton
Devon
EX14 1LZ

The Beehive has a CCTV system in operation.

The footage and information recorded by our CCTV system is stored here at The Beehive. As the data controller, Honiton Community Complex is responsible for this information.

We record, store and process this information for the following purposes:

- The security and safety of anyone visiting or using the building, including members of the public and our Staff
- The security of the building itself

There are 10 cameras in the public areas inside the building.

The data recorded and stored on our system will be only accessible to members of Honiton Community Complex’ Staff; and – in the event it is deemed necessary – to Devon and Cornwall Police.

Examples of when we would share this data with the Police include: the need for the identification, apprehension and prosecution of offenders; and reducing the incidence of crime and anti-social behaviour (including theft and vandalism)

CCTV Policy

Introduction

Under the *Protection of Freedoms Act 2012* the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the *Data Protection Act 1998*.

On 25 May 2018 the *General Data Protection Regulation (GDPR)* comes into force across the EU and will replace all data protection legislation in EU member states (including the UK’s Data Protection Act 1998). This is without the need for further national legislation.

This Policy explains how Honiton Community Complex will operate the CCTV system owned by it and located at The Beehive and will comply with current legislation. It is prepared after taking due account of the *Code of Practice for Surveillance Cameras and Personal Information* published by the Information Commissioner.

Statement of Purpose

The purpose(s) of the CCTV system installed by Honiton Community Complex is:

- to monitor the security of the arts and community building and users equipment and assets in the building;
- to assist Law Enforcement Agencies with identification, detection, apprehension and prosecution of offenders of crime and anti-social behaviour in the building with retrievable relative images provided by the system;
- to provide a safe and secure environment for users, visitors and staff and to help prevent loss or damage to the building and equipment and assets of Honiton Community Complex and users;
- to reduce the fear of crime and anti-social behaviour of persons using and working in building so they can enter and leave the buildings and use the facilities provided by Honiton Community Complex without fear of intimidation by individuals or groups;
- to deter potential offenders by publicly displaying the existence of CCTV and signs of its operation around The Beehive building.

Lawful basis for processing

Honiton Community Complex is a charity and has certain obligations. Most personal information collected by it is processed for compliance with a legal obligation which includes the discharge of the charity's statutory functions and running of the building.

Any personal information collected and used in connection with the CCTV system will be processed to provide for the general public's benefit a safe and secure environment, free from crime and anti-social behaviour, and damage to the building and assets provided for community use and enjoyment.

Location

The installation consists of 10 high definition cameras in the building.

Every effort has been made to ensure that the CCTV cameras are sited and image capture is restricted so as not to view or record areas that are not intended to be the subject of surveillance, such as offices and toilets.

The system does not have sound recording capability.

Maintenance

The CCTV system is maintained for Honiton Community Complex by Tamar Security under an annual maintenance contract.

Signage

In areas where the CCTV is installed Honiton Community Complex will ensure that there are prominently placed signs at both the entrance to the CCTV zone and within the controlled area. The signs will be clearly visible and readable, of an appropriate size depending on the context and will signal that Honiton Community Complex is operating the system.

Management of the system

Honiton Community Complex has responsibility for the control of images and decisions on how the CCTV system is used.

Day-to-day operational responsibility rests with the Operations Manager who may be consulted out of hours, if and when necessary at manager@beehivehoniton.co.uk
Access to recorded images is restricted to the Operations Manager for Honiton Community Complex.

The Operations Manager is aware of the procedures that need to be followed when accessing recorded images and is trained in the responsibilities under the CCTV Code of Practice.

All access to the medium on which the images are recorded is documented.

All Board members and staff are aware of the restrictions in relation to access to, and disclosure of, recorded images.

Image storage, viewing and retention

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.

Access to live images is restricted to the Operations Manager.

Recorded images can only be viewed in a restricted area approved by Honiton Community Complex.

Periods of retention of images are intended to reflect Honiton Community Complex's purpose for recording the information. Normally, images will be deleted at 10-14 day intervals which will provide adequate time for any incidents of a criminal or anti-social nature to have come to light and to have been reported to Law Enforcement Agencies (usually the police). On occasion, however, personal information 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. A record of this process will be captured.

Images retained for evidential purposes will be retained in a locked area accessible by the Operations Manager only. The Operations manager will ensure that the reason for retention is recorded, where the images are kept, any use made and when they are finally destroyed.

Disclosure of images

Judgements regarding disclosure to third parties (such as system maintenance providers) can only be authorised by Honiton Community Complex, as data controller, with the right to refuse any request for information unless there is an overriding legal obligation, such as a court order or information access rights.

Disclosure of information will be controlled and consistent with the purpose(s) for which the system is established. It is intended that CCTV images produced on the system will be used by Law Enforcement Agencies alone for their purposes of detecting, investigating and preventing criminal or

anti - social behaviour. Once information is disclosed to the police or any other law enforcement body, they will become data controller for the copy they hold.

All requests for disclosure are recorded. If disclosure is denied, the reason is documented.

Individuals' access requests

Individuals whose images are recorded have a right to be provided with a copy of the images caught by the request that constitute their personal data, unless they agree otherwise, such as by viewing the footage. Requests for access should be made by email or in writing to the Operation's Manager at The Beehive, Dowell St, Honiton, Devon EX14 1LZ.

If a request is received the Operations Manager will comply with it within one month of receiving the request. No fee will be charged unless the request is manifestly unfounded or excessive.

Those requesting access must provide enough detail to allow the Operators to identify that they are the subject of images, and for the Operators to locate the images on the system, for example: date, time and location.

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

Other Individuals' Rights

Unless subject to an exemption, the law gives individuals additional rights to control what personal information Honiton Community Complex uses and how.

Change of inaccurate information

If something written on a file that is out of date, incomplete or incorrect Honiton Community Complex will update it.

Right to erasure

An individual can ask for their personal information to be deleted where it is no longer necessary, was unlawfully processed, they withdraw their consent or object to the processing, or they need to comply with a legal obligation.

Right to restrict use of personal information

Where there is a dispute in relation to the accuracy or processing of personal information, or it is needed regarding a legal claim, the individual has the right to request a restriction is placed on further processing.

Right to object

Individuals have the right to object to the processing of their personal information.

Right to complain

Individuals have the right to lodge a complaint with the Information Commissioner

Enquires about the operation of the CCTV

Requests can be made to a public authority for information under the Freedom of Information Act 2000 relating to surveillance systems, such as the operation of the system, its siting or the cost of using and maintaining it. If such a request is received by Honiton Community Complex it will consider whether disclosure is appropriate and/or whether an exemption under the Act applies.

Requests under the Freedom of Information Act must be in writing and will receive a written response within 20 working days from the Operations Manager.

Monitoring, compliance, evaluation and review

Honiton Community Complex is committed to the recommendations of the *Code of Practice for Surveillance Cameras and Personal Information* published by the Information Commissioner.

To exercise any rights, queries or complaints, please in the first instance contact the Operations Manager at manager@beehivehoniton.co.uk

For independent advice, data protection compliance concerns or to lodge a formal complaint, contact the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/global/contact-us/email> or Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

The Beehive will undertake regular audits to ensure the use of the CCTV continues to be relevant and appropriate in accordance with its stated purpose, location, images recorded, storage length and deletion.

The efficacy of this policy will be reviewed at least annually by Honiton Community Complex and any updates will be placed on the website and the date below will indicate when this policy was last updated. Any changes are effective when we post the updated policy.

Any major change that would have a significant impact on either the purpose(s) or this policy will take place after discussion by Honiton Community Complex and resolution at a Board meeting.

If Honiton Community Complex decides to change the way in which it uses the CCTV, it will provide members of the public with information of the new purpose(s) prior to commencing the processing and setting out the relevant purposes and processing conditions and will inform the Information Commissioner within 28 days.

Adopted May 2018