



CCTV POLICY

Responsible Officer: Andy Townsend, General Manager

Reviewed on: 23rd October 2019

Next Review Date: October 2020

Contact:

General Manager, Lifeskills, The Create Centre, Smeaton Road, Hotwells, Bristol, BS1 6XN

1. Introduction

Lifeskills is fully committed to the safety of its staff, volunteers and visitors and to this extent has invested in the security of its buildings and facilities.

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Lifeskills.

Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the GDPR 2016. The person ultimately responsible for data protection at Lifeskills is the General Manager.

The system comprises a number of fixed dome cameras located around the site. All cameras may be monitored and are only available for use by approved members of staff and school visitors during a school visit.

The CCTV system is owned by Lifeskills and will be subject to review annually.

2. Objectives of the CCTV System

The objectives of the CCTV system are:-

1. To enhance the personal safety of staff, volunteers and visitors to reduce the fear of physical abuse, intimidation and crime.
2. To enable school staff to monitor the activities of their pupils on the Lifeskills scenarios.
3. To assist in the training of volunteers.
4. To protect Lifeskills buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
5. To support the police in a bid to deter and detect crime.
6. To assist in identifying, apprehending and prosecuting offenders on the site.
7. To assist in the usage and management of the facility on a day to day basis.

3. Statement of Intent

1. The CCTV system will be registered with the Information Commissioner under the terms of the GDPR 2016 and will seek to comply with the requirements both of the GDPR 2016 and the Commissioner's Code of Practice.
2. The charity will comply with the GDPR 2016, whether it be information, recordings and downloads which relate to the CCTV system.
3. Cameras will be used to monitor activities within the Lifeskills buildings to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants, together with its visitors.
4. Materials or knowledge secured as a result of CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.
5. The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.
6. 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

The system will be administered and managed by the General Manager, in accordance with the principles and objectives expressed in this Policy.

1. The day-to-day management will be the responsibility of the General Manager.
2. The CCTV system will be operated 24 hours each day, every day of the year.

5. CCTV System

1. The General Manager will check and confirm the efficiency of the system on a weekly basis and in particular that the equipment is properly recording and that cameras are functional.
2. Access to the CCTV recordings will be strictly limited to the members of staff approved by the General Manager.

6. Liaison

1. Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

7. Monitoring Procedures

1. Camera surveillance may be maintained at all times for monitoring purposes.

8. Video Download Procedures

1. Recordings may be viewed by the police for the prevention and detection of crime. Permission to do this will be given by the General Manager.
2. A record will be maintained of the release of downloads to the police or other authorised applicants. A register will be available for this purpose and will be kept by the General Manager.
3. Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police can only be actioned in accordance with the GDPR 2016.
4. Should a download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will only be released to the police on the clear understanding that the disc remains the property of Lifeskills, and both the disc and information contained on it are to be treated in accordance with this Policy. Lifeskills also retains the right to refuse permission for the police to pass to any other person the disc or any part of the information contained thereon.
5. Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the General Manager. In these circumstances downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £100.00 can be charged in such circumstances.

9. Breaches of the Policy (including breaches of security)

1. Any breach of this Policy by Lifeskills staff will be initially investigated by the General Manager, in order for him or her to take the appropriate disciplinary action.
2. Any serious breach of the Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

10. Assessment of the Scheme and CCTV Usage Policy

1. Performance monitoring, including random operating checks, may be carried out by the approved persons.

11. Complaints

1. Any complaints about the Lifeskills' CCTV system should be addressed to the General Manager.
2. Complaints will be investigated in accordance with Section 9 of this Policy.

12. Access by the Data Subject

1. The GDPR 2016 subjects individuals (to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
2. Requests for Data Subject Access should be made in writing to the General Manager.

13. Public Information

A copy of this Policy will be located on the Lifeskills website for information purposes.

14. System Maintenance and Monitoring

1. The system will be maintained in accordance with the GDPR 2016.
2. The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).
3. It will be the responsibility of General Manager to liaise with the maintaining company for the reporting of faults on the system, any changes to the site which may affect the operation of the system.
4. It will be the responsibility of the General Manager to arrange regular system reviews with the maintaining company.

15. Summary of Key Points

- This CCTV Usage Policy will be reviewed on an annual basis.
- The CCTV system is owned and operated by Lifeskills.
- The CCTV system will not be manned out of operating hours.
- The CCTV system cannot be accessed by visitors/ members of the public except by prior arrangement with the General Manager and with good reason.
- Liaison meetings may be held with the police and other bodies.
- Copies of downloads may only be viewed by authorised staff and the police.
- Copies required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any breaches of this Policy will be investigated by the General Manager. An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the General Manager.
- The system will be maintained on a regular basis by an approved contractor.