



# CCTV and Surveillance Policy

**Date Approved:**

June 2024

**Approved by:**

Chair-person

**Next Review:**

June 2026

## **Introduction**

At Stamford Street Allotment, we take our responsibility towards the plot holders, the committee and visitors very seriously. To that end, we use surveillance cameras to provide a safe and secure environment and to prevent physical damage to our site.

**The purpose of this policy is to manage and regulate the use of the surveillance and CCTV systems across our site and ensure that:**

- We comply with the UK GDPR under the Data Protection Act 2018.
- The images that are captured are useable for the purposes we require them for.
- We reassure those persons whose images are being captured, that the images are being handled in accordance with data protection legislation.

**This policy covers the use of surveillance and CCTV systems which capture moving and still images of people who could be identified, as well as information relating to individuals for any of the following purposes:**

- Prevention or detection of crime or equivalent malpractice.
- Identification and prosecution of offenders.
- Monitoring of the security of the premises.
- Ensuring that health and safety rules and society procedures are being complied with.

## **Location of cameras**

Cameras are located at a number of strategic places on the site. The Society has positioned the cameras so that they mainly cover communal or public areas on the Society's premises, and they have been sited so that they provide clear images.

Appropriate signs are prominently displayed so that plot holders and visitors are aware they are entering an area covered by CCTV.

Some tenants have elected to have their own cameras, but they are to provide clear signage to state they have CCTV footage on their plot. All tenants with camera footage must be known to the committee and committee does not take responsibility for the use of the footage on these cameras.

## **Recording and retention of images**

The society will only use surveillance cameras for the safety and security of the site and its plot holders and visitors. Surveillance will be used as a deterrent for violent or anti-social behaviour and damage to property. CCTV cameras are only placed where they do not intrude on anyone's privacy and are necessary to fulfil their purpose.

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Surveillance and CCTV systems will be tested for security flaws once a month to ensure that they are being

properly maintained at all times. Surveillance and CCTV systems will not be intrusive.

Any unnecessary footage captured will be securely deleted from the database. Any cameras that present faults will be repaired immediately as to avoid any risk of a data breach.

As the recording system records digital images, any CCTV images that are held on the SD card and a secure cloud-based online server overwritten on a recycling basis and, in any event, once the hard drive has reached the end of its use, it will be erased prior to disposal.

### **Access to and disclosure of images**

Access to, and disclosure of, images recorded on communal CCTV is restricted to the chair person and an individual nominated by the committee. Access to the camera footage on tenants personal CCTV must be available for the use of the committee when required and the tenant only. When necessary, due to an a prevention or detection of crime or equivalent malpractice, recordings will be downloaded onto the secure network in compliance with the UK GDPR under the Data Protection Act 2018.

This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure password protected location available to view by authorised personnel.

Access to recorded images is restricted to the operators of the CCTV system and to those officials who are authorised to view them in accordance with the purposes of the system.

Viewing of recorded images will take place in a restricted area to which other unauthorised persons will not have access when viewing is occurring.

### **Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:**

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Relevant legal representatives.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

**The Society Chair-person is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.**

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

### **Individuals' access rights**

Under the UK's data protection laws, including the General Data Protection Regulation, individuals have the right on request to receive a copy of the personal data that the society holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to the Society's Chair-person at the registered email address or via the website.

The Society will usually not make a charge for such a request, but we may charge a reasonable fee if you make a request which is manifestly unfounded or excessive, or is repetitive. Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images.

The Society will usually respond promptly and in any case within one month of receiving a request. However, where a request is complex or numerous the Society may extend the one month to respond by a further two months.

The Society will always check the identity of the person making the request before processing it.

The Chairperson will always determine whether disclosure of your images will reveal third party information, as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Society is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

### **Implementation**

The Society's Chairperson is responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of the Society's use and processing of CCTV images and ensure that at all times it remains compliant with the laws regulating data protection and privacy. Any complaints or enquiries about the operation of the Society's CCTV system should be addressed to the Chairperson.

### **Further Information**

Further information on CCTV and its use is available from the following:

- [ico.org.uk](https://ico.org.uk)
- [Regulation of Investigatory Powers Act \(RIPA\) 2000](#)
- [Data Protection Act 1998](#)

## **Complaints**

Any complaints relating to this policy or to the CCTV system operated by the site, should be made in accordance with the Complaints Policy.

## **Monitoring and review**

This policy is reviewed every two years by the committee and approved by the Chair-person. The next scheduled review date for this policy is June 2026.

Any proposed changes will be considered by the committee for approval by the Chair-person.