WHEELHOUSE SQUARE FLATS

CCTV POLICY

Wheelhouse Square Flats (**Charity**) has in place a CCTV surveillance system (**System**) at its almshouses at Wheelhouse Square Dean Road Scarborough YO12 7SP (**Wheelhouse Square**)

The Secretary of the Board of Trustees (**Data Administrator)** is responsible for the operation of the system and for ensuring compliance with this policy and may be contacted either in writing c/o The Warden's Office, Wheelhouse Square, Dean Road, Scarborough YO12 7SP or by email: secretary@wheelhouse-almshouse.org.uk

CCTV digital images if they show a recognisable person are personal data and are covered by the General Data Protection Regulations as supplemented by the Data Protection Act 2018. (**Data Protection Regulations**) This Policy is associated with the Charity's **Data Protection Policy** the provisions of which should be adhered to at all times.

The System

The System comprises: fixed position cameras; digital recorders; and public information signs.

The cameras will be located at strategic points in Wheelhouse Square. No camera will be hidden from view.

Signs are prominently placed at strategic points in Wheelhouse Square to inform residents, the Charity's Trustees, the Warden, volunteers, visitors and members of the public that a CCTV installation is in use.

Although every effort has been made to ensure maximum effectiveness of the System it is not possible to guarantee that the System will detect every incident taking place within the area of coverage.

Purpose of the System

The System has been installed by the Board of Trustees of the Charity with the primary purpose of reducing the threat of crime generally and protecting Wheelhouse Square and helping to ensure the safety of the residents, the Charity's Trustees, the Warden, volunteers and visitors consistent with respect for the individuals' privacy. These purposes will be achieved by using the system to:

- deter those having criminal intent;
- assist in the prevention and detection of crime;
- facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order; and
- facilitate the movement of vehicles on site.

The system will not be used:

- to provide recorded images for the world-wide-web;
- to record sound; or
- for any automated decision taking.

Recording

Images captured by the System will be recorded in the Warden's office in Wheelhouse Square.

Images of identifiable living individuals are subject to the provisions of the Data Protection Regulations and the Warden is responsible for ensuring day to day compliance with the Regulations. All recordings will be handled in strict accordance with this policy.

All the Charity's Trustees, the Warden and volunteers will be made aware of the sensitivity of handling CCTV images and recordings.

Digital recordings are made using digital video recorders operating in time lapse mode. Incidents may be recorded in real time.

Images will normally be retained for 7 days from the date of recording and then automatically over written and the CCTV log updated accordingly. Once a hard drive has reached the end of its

use it will be erased prior to disposal and the CCTV log will be updated accordingly.

All hard drives and recorders shall remain the property of the Charity until disposal and destruction.

Access to images

All access to images will be recorded in the CCTV log.

Access to images will be restricted to those Charity Trustees, the Warden or volunteers needing to have access in accordance with the purposes of the System.

Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the System and is limited to the following authorities:

- law enforcement agencies where images recorded would assist in a criminal enquiry and/or the prevention of terrorism and disorder;
- prosecution agencies;
- relevant legal representatives;
- the media where the assistance of the general public is required in the identification of a victim of crime or the identification of a perpetrator of a crime;
- persons whose images have been recorded and retained unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings; and
- emergency services in connection with the investigation of an accident.

CCTV digital images if they show a recognisable person are personal data and are covered by the Data Protection Regulations. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data subject to exemptions contained in the Regulations. They do not have the right of instant access.

A person whose image has been recorded and retained and who wishes access to the data must apply in writing to the Data

Administrator c/o The Warden's Office, Wheelhouse Square Flats, Dean Road, Scarborough YO12 7SP.

The Data Administrator will then arrange for a copy of the data to be made and given to the applicant. The applicant must not ask anyone else to show them data or for a copy of the data. All communications must go through the Data Administrator. A response will be provided promptly and in any event within one month of receiving the request and if requested evidence of identification of the applicant. No fee is payable.

The Data Protection Regulations gives the Data Administrator the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders.

If it is decided that a data subject access request is to be refused the reasons will be fully documented in the CCTV log and the data subject informed in writing stating the reasons.

All access requests and the outcome of such requests will be recorded in the CCTV log.

Request to prevent processing

An individual has the right to request a prevention of processing where this is likely to cause substantial and unwarranted damage or distress to that or another individual.

All such requests should be addressed to the Data Administrator c/o The Warden's Office, Wheelhouse Square Flats, Dean Road, Scarborough YO12 7SP who will provide a written response within 21 days of receiving the request setting out their decision on the request. A copy of the request and response will be retained.

All prevention requests and the outcome of such requests will be recorded in the CCTV log.

Complaints

It is recognised that residents, the Warden or others may have concerns or complaints about the operation of the system. Any

complaint should be addressed in the first instant to the Secretary of the Board of Trustees c/o The Warden's Office, Wheelhouse Square Flats, Dean Road, Scarborough YO12 7SP. If the complaint remains unresolved the complainant may complain to the Chair of the Board of Trustees c/o The Warden's Office, Wheelhouse Square Flats, Dean Road, Scarborough YO12 7SP.

Concerns or enquiries relating to the provisions of the Data Protection Regulations may be addressed to the Data Administrator c/o The Warden's Office, Wheelhouse Square Flats, Dean Road, Scarborough YO12 7SP. These rights do not alter the existing rights of the Warden or others under any relevant grievance or disciplinary procedures.

Compliance monitoring

All documented procedures and the effectiveness of the System in meeting its purposes will be kept under review and reports submitted as required to the Board of Trustees.

Review

This policy will be reviewed regularly by the Board of Trustees of the Charity to ensure it remains up to date and compliant with the law.