



# Gresty Street Community Allotment Association (GSCAA)

[www.spanglefish.com/gsaa](http://www.spanglefish.com/gsaa)

## CCTV Policy

- 1.1 Gresty Street Community Allotment Association (GSCAA) uses closed circuit television (CCTV) images for the prevention, identification, and reduction of crime, including fly-tipping and to monitor parts of the allotment grounds in order to provide a safe and secure environment for plot holders and to prevent the loss of or damage to GSCAA property.
- 1.2 CCTV surveillance at GSCAA is operational 24 hours a day and is intended for the purposes of:
  - protecting the buildings and assets
  - promoting the health and safety of plot holders
  - reducing the incidence of crime and anti-social behaviour (including theft, vandalism and fly-tipping)
  - supporting the Police in a bid to deter and detect crime
  - ensuring that the rules are respected so that GSCAA can be properly managed.
- 1.3 **The system 1 fixed position camera which points onto the site with no collateral intrusion.**
- 1.4 The CCTV system is owned by GSCAA, and its deployment is determined by the committee. The CCTV is a standalone system and operated by GSCAA.
- 1.5 The CCTV is unmonitored, and images collected can be viewed and reviewed by authorised members of the committee.
- 1.6 GSCAA's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act (Registration Number: ZB539185). This policy outlines GSCAA's use of CCTV and how it complies with the Act.
- 1.7 All authorised operators and committee members with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All committee members are aware of the restrictions in relation to access to, and disclosure of, recorded images.
- 1.8 GSCAA complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 1.9 The use of the CCTV system will be conducted in a professional, ethical, and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

## 2 Justification for Use of CCTV

- 2.1 The use of CCTV to monitor part of the allotment grounds for security purposes has been deemed to be justified by the committee. The system is intended to capture images of fly-tipping, individuals accessing the site and of antisocial behaviour.
- 2.2 The installation of CCTV is proportionate in addressing such issues that may have arisen prior to the installation of the system.

## 3 Data Protection Impact Assessments

- 3.1 Where new CCTV systems or cameras are to be installed, GSCAA will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve the need for consultation with plot holders.

## 4 Location of Cameras

- 4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated.
- 4.2 GSCAA will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. GSCAA will make every effort to position cameras so that their coverage is restricted to GSCAA infrastructure and assets, which may include outdoor areas.
- 4.3 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. GSCAA has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.
- 4.4 CCTV Video Monitoring and Recording of Public Areas may take place for the following purposes:
  - Protection of GSCA buildings and property: Particularly entrances and exits from the site.
  - Monitoring of public areas: Green and general waste bins, parking areas and roadways.
  - Criminal Investigations (carried out by police): Robbery, burglary, theft surveillance and fly-tipping.

## 5 Covert Surveillance

- 5.1 GSCAA will not engage in covert surveillance without prior notice or reason.

## 6 Notification

- 6.1 A copy of this CCTV Policy will be provided on request to plot holders and visitors to the site and will be made available on GSCAA website.
- 6.2 The location of CCTV cameras will also be indicated, and adequate signage will be placed at each location in which a CCTV camera(s) is sited to indicate that CCTV is in operation.

6.3 Adequate signage will also be prominently displayed at the entrance to GSCAA property. Signage shall include the name and contact details of the data controller as well as the specific purpose(s) for which the CCTV camera is in place in each location.

Appropriate locations for signage will include:

- at the main entrances to the site
- at or close to each camera position

## 7 Storage and Retention

7.1 The images captured by the CCTV system will be retained for a maximum of 31 days or written over, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

7.2 The images/recordings will be stored in a secure environment with a log of access maintained.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of a designated committee member, currently **Mark Cotton**.

7.4 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7.5 A log of any images extracted from the hard disk of the system will be maintained and such images will be stored in a secure environment with access restricted to authorised personnel.

## 8 Access

8.1 Access to the CCTV system and stored images will be restricted to authorised personnel only by the use of a password.

8.2 A written record of access to images will be made.

8.3 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.4 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

8.5 In relevant circumstances, CCTV footage may be accessed:

- By the police where GSCAA (or its agents) are required by law to make a report regarding the commission of a suspected crime; or

- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on GSCAA's property; or
- To assist the committee in establishing facts in cases of a report of fly-tipping, a crime or antisocial behaviour; or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request; or
- To individuals (or their legal representatives) subject to a court order; or
- To GSCAA's insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

## 9 Subject Access Requests (SAR)

- 9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 9.2 Individuals submitting requests for access should do so using the form provided on the website at [www.spanglefish.com/gscaa](http://www.spanglefish.com/gscaa). Sufficient information must be provided to enable the footage relating to them to be identified, including the date, time and location. Once completed the form must be sent by email to [gsca.association@gmail.com](mailto:gsca.association@gmail.com) or delivered/posted to: GSCAA, Allotment Post Box, Gresty Street, Penkhull, Stoke-on-Trent.
- 9.3 GSCAA will respond to requests within 30 calendar days of receiving the request in line with ICO Guidance.
- 9.4 GSCAA reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.
- 9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.
- 9.6 In giving a person a copy of their data, GSCAA may provide a still, series of still pictures or a video file with relevant images. However, other images of other individuals will be obscured before the data is released.
- 9.7 Where footage contains images relating to 3rd parties, GSCAA will take appropriate steps to mask and protect the identities of those individuals.

## 10 Complaints

- 10.1 Complaints and enquiries about the operation of CCTV within GSCAA should be made by email to [gsca.association@gmail.com](mailto:gsca.association@gmail.com) in the first instance.

## 11 Training

- 11.1 The committee and anyone else authorised to access the CCTV system will be trained to comply with this policy.
- 11.2 The committee will receive appropriate training to enable them to identify and handle different requests according to regulations.

11.3 Misuse of surveillance system information could lead to legal proceedings and fines issues by the ICO.

## 12 Responsibilities

12.1 The committee or their nominated representative will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by GSCAA
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes relating to the allotments
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at GSCAA is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
- Maintain a record of access (e.g. an access log) to or the release of copies of any material recorded or stored in the system
- Ensure that monitoring recordings are not duplicated for release
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images extracted and recorded on DVDs/digital recordings are stored for a period not longer than 6 months and are then erased unless required as part of a criminal investigation, or for current or possible future court proceedings (criminal or civil).
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas