

AGE UK EXETER

Controlled Document

Document Name: CCTV Policy

Document Version Number: 1

Agreed by Risk and Quality Committee: 01.04.23 (online)

Approved by Board of Trustees on: 01.04.23 (online)

Review Schedule: Every three years

Next review due: 01.04.26

Owner (Responsibility) CEO

Amendments to: Governance Officer

Revision History: See end of document

Document location: www.ageuk.org.uk/exeter/about-us/policiesandguidelines

Document Description

This policy is intended to enable staff, clients, volunteers, and partners to understand how Age UK Exeter uses CCTV, the rights individuals may have in relation to CCTV, who has access to CCTV images and how individuals can raise any queries or concerns they may have.

Implementation and Quality Assurance

Implementation is immediate and this policy shall stay in force until any alterations are formally agreed.

The policy will be reviewed every three years by the Board of Trustees, sooner if legislation, best practice, or other circumstances indicate this is necessary.

All aspects of this policy shall be open to review at any time. If you have any comments or suggestions on the content of this policy, please contact the CEO on info@ageukexeter.org.uk or at Age UK Exeter, The Sycamores, Mount Pleasant Road, Exeter, EX4 7AE, 01392 202092.

CCTV Policy

1. Introduction

We currently use CCTV to view and record individuals coming, shopping, and going at our Shed/Shop site on Wardrew Road, Exeter, 24 hours per day, 7 days per week. This policy sets out why we use CCTV, how we will use CCTV and how we will process any CCTV data recorded to ensure that we are compliant with Data Protection Law.

The images of individuals recorded by CCTV are Personal Data and therefore subject to UK General Data Protection Regulations (UK GDPR). Age UK Exeter is the Data Controller of all CCTV data captured at our site.

This policy covers all staff, volunteers, clients, partners, and members of the public visiting the site.

2. Definition

We currently use CCTV around our site as outlined below. We believe that such use is necessary for the following legitimate business purposes:

(a) to prevent or detect crime and protect buildings and assets from damage, disruption, theft, vandalism, and other crime.

(b) for the personal safety of staff, clients, volunteers, members of the public and partners and to act as a deterrent against crime.

(c) for the health and safety of those using Age UK Exeter facilities.

(d) to support law enforcement bodies in the prevention, detection, and prosecution of crime; and

(e) to support any internal investigations as part of a staff disciplinary procedure.

We may implement or use CCTV for purposes other than those specified above which we will notify you of from time to time.

3. Procedures and Principles

3.1 Monitoring

The locations of the CCTV are chosen to minimise the viewing of spaces/individuals which are not relevant to the legitimate purpose of the monitoring as specified above.

- Currently, none of our CCTV records sound (feature disabled).
- Our CCTV footage is not monitored continuously, and images are only revisited in the event of an incident or if a request is made.
- Any staff using CCTV will be given training to ensure that they understand and observe the legal requirements relating to the processing of any data gathered.

3.2 How we operate CCTV

Where CCTV is in use at our site, we will ensure that signs are displayed at the entrance of the surveillance zone to alert staff, clients, volunteers, members of the public and partners that their image may be recorded. The signs will contain details of the organisation operating the system (where they are operated by a third party) and who to contact for further information.

We will ensure that images from the CCTV are only viewed by appropriately authorised members of staff or third-party service providers whose role requires them to have access to such CCTV data. Recorded images will only ever be viewed in the office of the Chief Executive Officer.

3.3 How we use the data

To ensure that the rights of individuals recorded by our CCTV are protected, we will ensure that CCTV data gathered from such systems is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

We will ensure that any CCTV data is only used for the purposes specified in section 2 above. We will not use CCTV data for another purpose unless permitted by General Data Protection Regulations. Where we engage Data Processors to process data on our behalf, we will ensure contractual safeguards are in place to protect the security and integrity of the data.

3.4 Retention and erasure of data

Data recorded by our CCTV will be stored securely in the device. The camera records continuously for 28 days, then records over the material. If data/footage is extracted from the device, it will only be kept as proof of an event that happened or occurrence. For example, where images are being recorded for crime prevention purposes, CCTV data will be kept only for as long as it takes to establish that a crime has been committed. At the end of its useful life and in any event within 6 years all data stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs or hard copy photographs will be promptly disposed of as confidential waste.

3.5 Ongoing review of our use of CCTV

We will periodically review our ongoing use of existing CCTV at our site to ensure that its use remains necessary and appropriate and in compliance with Data Protection Laws. We will also carry out checks to ensure that this policy is being followed by all staff.

3.6 Rights of data subjects

As CCTV data will identify individuals, it will be considered personal data under applicable Data Protection Laws. Under UK Data Protection Regulations, data subjects have certain rights such as rights of access and rights to be forgotten. Please see our AUKE Data Protection Policy for more information.

3.7 Requests of disclosure by third parties

No images from our CCTV cameras will be disclosed to any third party without express permission/consent being given by the data subject.

With the express permission of the Chief Executive Officer, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

3.8 Complaints

If any member of staff has questions about this policy or any concerns about our use of CCTV, then they should speak to the Chief Executive Officer in the first instance.

Where this is not appropriate or matters cannot be resolved informally, employees should use our formal Grievance Procedure. If you are not an employee, you can use our official Complaints Procedure.

Revision History

Revision date	Summary of Changes	Other Comments
22 March 2023	New policy with help and collaboration from The Upper Room Charity, London	