Vision 4 Youth

CCTV Policy

Vision 4 Youth (V4Y) uses closed circuit television (CCTV) images to protect V4Y's property. This policy sets out the details of how V4Y will collect, use and store CCTV images. For more information on your privacy rights associated with the processing of your personal data collected through CCTV images please refer to V4Y's data protection policy.
V4Y's CCTV facility, unless there are exceptional circumstances (see covert recording below), will only record images. There is no audio recording i.e. conversations are not recorded on CCTV.

Purposes of CCTV
V4Y considers it necessary and proportionate to install and use a CCTV system. The data collected from the system will assist in:
· Prevention or detection of crime or equivalent malpractice.
· Identification and prosecution of offenders.
· Monitoring of the security of the youth suite at The Tythings when the building is closed and not in use.

Location of cameras
A camera is located in the youth suite at The Tythings, Yateley, GU46 7RP. V4Y has positioned the camera so that they only cover communal or public areas on the Company's business premises and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices.
The camera is clearly visible in the main room of the suite.
Appropriate signs are prominently displayed so that employees, clients, customers and other visitors are aware they are entering an area covered by CCTV.

Recording and retention of images
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. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.
Images are only recorded at certain times, as the needs of the charity dictate.
As the recording system records digital images, any CCTV images that are held in the cloud via HIK Connect are deleted and overwritten on a recycling basis and, in any event, should the camera be taken down any images stored will be deleted.
Images that are stored on, or transferred on to, removable media such as CDs or which are stored digitally are erased or destroyed once the purpose of the recording is no longer relevant. [In normal circumstances, this will be a period of 12 months]. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

Access to and disclosure of images
Access to, and disclosure of, images recorded on CCTV is restricted. 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 online and held in a HIK Connect account. Access to recorded images is restricted to the login of the HIK Connect account and to those line managers 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 employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

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.

· Prosecution agencies, such as the Crown Prosecution Service.

· Relevant legal representatives.

· The V4Y Board of Trustees, or Yateley Town Council (the landlord) when reviewing a situation as outlined in the purposes for CCTV to be installed above.

· 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 Board of Trustees and the Development Manager are the only people who are permitted to authorise disclosure of images to external third parties such as law enforcement agencies or Yateley Town Council. 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 (GDPR), individuals have the right on request to receive a copy of the personal data that the Company 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 Development Manager. This can be done by using this email address admin@vision4youth.org.uk. V4Y 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.

V4Y will usually respond promptly and in any case within one month of receiving a request. However, where a request is complex or numerous V4Y may extend the one month to respond by a further two months.

V4Y will always check the identity of the person making the request before processing it.

The Development Manager 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 V4Y 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.

Covert recording

V4Y is aware that covert recording can only be done in exceptional circumstances for example where V4Y suspects criminal activity taking place. On this basis V4Y will only undertake covert monitoring if it has carried out a data protection impact assessment which has addressed the following:

· the purpose of the covert recording;

· the necessity and proportionality of the covert recording;

· the risks to the privacy rights of the individual(s) affected by the covert recording;

· the time parameters for conducting the covert recording

· the safeguards and/or security measures that need to be put in place to ensure the covert recording is conducted in accordance with the data protection laws, including the GDPR.

If after undertaking the data impact assessment V4Y considers there is a proportionate risk of criminal activity, or equivalent malpractice taking place or about to take place, and if informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection, V4Y will covertly record the suspected individual(s). In doing this V4Y will rely on the protection of its own legitimate interests as the lawful and justifiable legal basis for carrying out the covert recording.
Before the covert recording commences the Company will ensure that the Development Manager and the Board of Trustees agree with the findings of the data protection assessment and provides written authorisation to proceed with the covert recording.
Covert monitoring may include both video and audio recording.
Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.
Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which V4Y cannot reasonably be expected to ignore.

Staff training
V4Y will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the laws regulating data protection and privacy with regard to that system.

Implementation
The Board of Trustees are 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 V4Y'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 Company's CCTV system should be addressed to the Development Manager.

Data Protection
V4Y will process the personal data collected in connection with the operation of the CCTV policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of this data will constitute a data breach and should be reported immediately to V4Y's Development Manager in accordance with V4Y's data protection policy. Reported data breaches will be investigated and may lead to sanctions under V4Y's disciplinary procedure.

Revision
Reviewed November 2024