

Addiscombe, Woodside & Shirley Leisure Gardens Ltd



AWSLG CCTV Policy

Introduction

AWSLG uses closed circuit television (CCTV) images to protect the Society's property and to provide a safe and secure environment for shareholders, plot holders and visitors to the Allotment. This policy sets out the details of how the Society 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 the Society's Data Protection Policy.

The Society's CCTV facility will only record images. There is no audio recording i.e. conversations are not recorded on CCTV.

Purposes of CCTV

The Society 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 Society's business premises.
- Ensuring that health and safety rules and Society procedures are being complied with.

Location of cameras

Cameras are located at two strategic places. The Society has positioned the cameras so that they only 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 shareholders, plot holders, 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.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and 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 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 centrally and held in a secure location. 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 AWSLG Chairman 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 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 Company's Chairman or the Data Protection Officer. This can be done by using this email address awslg.ltd@gmail.com 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 Chairman or the Data Protection Officer 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 Data Protection Officer 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 Chairman or the Data Protection officer.

Further Information

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

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998