

# **Friends of Windmill Gardens**

## **CCTV Policy**

# Document control

<b>Title</b>	CCTV Policy
<b>Prepared by</b>	FOWG Board of Trustees
<b>Contributors</b>	
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## **1. Ownership**

1.1 Friends of Windmill Gardens (FoWG) operates a CCTV surveillance system (“the CCTV system”) in its premises (“FoWG premises”).

1.2 The CCTV system installed in FoWG premises is owned and operated by FoWG and is monitored locally by authorised staff only

1.3 This policy sets out FoWG’s principles guiding the use of the CCTV system in accordance with all relevant laws.

## **2. Compliance**

2.1 FoWG is fully committed to meeting its obligations under the Data Protection Act 2018, the General Data Protection Regulation (EU) 2016/679 and associated legislation (“the Data Protection Laws”).

2.2 Images obtained from the CCTV system (“Images”) which includes recognisable individuals constitutes personal data and are covered by the Data Protection Laws and this policy should be read in conjunction with the Privacy Policy.

2.3 FoWG complies with the Information Commissioner’s Office (ICO) Closed Circuit Television Code of Practice and is appropriately registered with the ICO as a data controller.

## **3. Purpose**

3.1 FoWG uses the CCTV system and the images produced (“Images”) to protect the rights and freedoms of clients, staff, volunteers, visitors, partners and anyone using the FoWG premises. This includes to prevent or detect crime in order to provide a safe and secure environment for everyone working at, or using, the FoWG premises and its facilities.

## **4. Description**

4.1 The CCTV system used in FoWG premises comprise a number of fixed and dome cameras which do not have any sound recording capability.

4.2 The CCTV system is positioned in such a way as to prevent, or minimize, recording of passers-by or of another person’s private property including restricting visibility of live images of data subjects through windows, doors, reflections etc. from visitors or persons located outside the area. Additionally, the camera covering the front of the centre will be software masked so that it does not record the adjoining playground.

4.3 The CCTV system monitors and records areas including the following:

4.3.1 main area inside the Brixton Windmill centre accessible to the public.;

4.3.2 area in the vicinity of the Windmill (Appendix 1); and

4.3.3 public area in the vicinity of the Brixton Windmill Centre (Appendix 1)

4.4 CCTV signs are prominently placed at the main external entrance of each of the FoWG premises and other outdoor areas as appropriate.

4.5 It is not the policy of FoWG to conduct 'covert monitoring' unless there is a legal, legitimate or public interest to do so, and any such requests will be decided taking into account proper justification on a case by case basis.

## **5. Operation**

5.1 The Images are recorded may be monitored by local authorised staff and will where possible not be visible to the public. Access to the CCTV system is strictly limited.

5.2 All staff who work on the CCTV system are made aware of the sensitivity of handling Images and are trained in all aspects of the CCTV system.

## **6. Access**

6.1 Access to Images will be restricted to only those staff authorised to view them. 6.2 Copies of Images will only be made where:

6.2.1 the incident recorded is required to assist in the investigation of offences and/or the prosecution of offenders by the Police; or

6.2.2 a copy is required to satisfy a valid subject access request (see section 9 below).

6.3 Where the CCTV system on FoWG premises may be controlled, supported or managed by another company on its behalf, FoWG will ensure that:

6.3.1 a legally binding contract outlining the responsibility of the contracting company as a data processor, as provided for by the Data Protection Laws, is in place; and

6.3.2 FoWG will secure sufficient guarantees from the contracting company in respect of the technical and organisational measures to be put in place to secure personal data that will be processed by them.

## **7. Retention**

7.1 The CCTV system is programmed to automatically record Images for a storage period of 28 days after which the Images are erased unless required for the investigation of offences or evidential purposes.

7.2 While retained, the integrity and confidentiality of the Images will be maintained at all times to ensure the rights of data subjects are protected whilst, at the same time, upholding the integrity of data stored.

7.3 Subject Access Requests (SAR)

7.3.1 In accordance with the provisions of the Data Protection Laws, individuals have the right to request access to CCTV footage relating to themselves (unless where disclosure to the individual would prejudice an ongoing criminal enquiries or proceedings).

7.3.2 Procedures are in place to ensure that all such access requests are dealt with effectively and within the law. If you wish to make a request, please write to us at the contact details set out in section 9 below setting out as much information as you can, including date, time and location of the requested data.

7.4 Application template for CCTV Data Access is set out in the Appendix 2.

## **8. Access to and Disclosure of Images to Third Parties**

8.1 Disclosure of Images will only be made to third parties in accordance with the CCTV system and in compliance with the Data Protection Laws, including to aid the investigation of a particular offence or incident, or a requirement under any enactment, rule of law or court or as required by a legal representative of FoWG.

8.2 All requests for disclosure will be recorded and, where appropriate, the images of other individuals not concerned will be blurred to protect their confidentiality.

## **9. FoWG's Contact Details**

Members of the public should address any subject access requests, concerns or complaints over use of the FoWG's CCTV system by:

- writing to us at FoWG / Brixton Windmill Centre, 100 Blenheim Gardens, London SW2 5DA;
- calling us on 02072725662; or
- emailing to [info@brixtonwindmill.org](mailto:info@brixtonwindmill.org)

FoWG staff should address any enquiries or concerns relating to the CCTV system to their line manager or Chair of the Board in the first instance.

## **10. Annual review**

This policy (Version 2) was last updated in February 2021 and will be reviewed annually to ensure that it complies with the Data Protection Laws.

## APPENDIX 1

### CCTV Design

#### General information

The newly built Windmill Visitor Centre requires CCTV coverage as it is situated in an area of antisocial behaviour. Internally, CCTV coverage is required for the main exhibition area and also between the doorway to the rear of the building.

#### CCTV Design:

The black cameras were specified for the project and vandal resistant for the three external cameras. The design snapshots below show you the camera details together with a simulated image at the furthest distance from the camera. The red lines are the maximum distance for infra-red nighttime vision.

The supply of an 8 channel CCTV recorder was included in the design to allow some scalability to add additional cameras if required in the future. The supply of a wall mounted CCTV monitor was also included. The system can be configured so that if persons enter the vicinity of the Windmill during closed periods, the system will send motion alerts to mobile users who can then view the live CCTV images and determine if the police need to be called to attend. It is anticipated that the CCTV cameras will act as a very good deterrent as all key areas have been covered. The camera covering the front of the centre will be software masked so that it does not record the adjoining playground.



**Camera 1**



1.

**Camera 2**



2.

**Camera 3**



3.

#### Camera 4



4.

#### Camera 5



5.



**APPENDIX 2**

**DATA PROTECTION ACT - APPLICATION FOR CCTV DATA ACCESS**

ALL Sections must be fully completed. Attach a separate sheet if needed.

Name and address of Applicant	
Name and address of "Data Subject" – i.e. the person whose image is recorded	
If the data subject is not the person making the application, please obtain signed consent from the data subject opposite	Data Subject signature .....
If it is not possible to obtain the signature of the data subject, please state your reasons.	
Please state your reasons for requesting the image.	
Date on which the requested image was taken.	
Time at which the requested image was taken.	
Location of the data subject at time image was taken (i.e. which camera or cameras)	
Full description of the individual, or alternatively, attach to this application a range of photographs to enable the data subject to be identified by the operator.	
Please indicate whether you (the applicant) will be satisfied by viewing the image only	

On receipt of a full completed application and the £10 fee, a response will be provided as soon as possible, and in any event within 40 days. In the event of a declined application the fee is non-refundable.

<b>INSTITUTION USE ONLY</b>	<b>INSTITUTION USE ONLY</b>
Access granted (tick)	
Access <b>not</b> granted (tick)	
Data Controller's name:	
Signature:	
Date:	

### APPENDIX 3

Signage to be displayed on the premises stating presence of CCTV



## **CCTV in Operation**

Images are being recorded for the purpose of crime prevention and public safety

This scheme is controlled by

For further information contact