



Roseisle Hall CCTV Policy

Policy summary

Roseisle Hall, College of Roseisle, Moray has in place a Closed-Circuit Television (CCTV) surveillance system. This policy details the purpose, use and management of the CCTV system and details the procedures to be followed in order to ensure that Roseisle Hall complies with relevant legislation and Codes of Practice where necessary.

Introduction

- Roseisle Hall uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the hall buildings in order to provide a safe and secure environment for Trustees, instructors, volunteers and members of the public and to prevent the loss of or damage to Roseisle Hall and property within.

The CCTV system is owned & managed by Roseisle Hall. Roseisle Hall is a Charity registered with Oscar SCO50481.

- The CCTV system is continually operational throughout the year.

Definitions CCTV

- Closed circuit television camera. A TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes and where access to their content is limited by design only to those able to see it.
- Covert surveillance - observation, and/or recording, carried out without the subject's knowledge, and may be done using cameras or devices that are not visible to the subject.
- Data controller - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of CCTV images.
- Data Protection Act 2018 (DPA) - UK data protection framework, regulating the processing of information relating to individuals. Facial/ automated recognition - the



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- System Operator - person or persons that take a decision to deploy a surveillance system, and/or are responsible for defining its purpose, and/or are responsible for the control of the use or the processing of images or other information obtained by virtue of such system. System User - person or persons who may be employed or contracted by the system operator who have access to live or recorded images or other information obtained by virtue of such a system.

Purpose

CCTV surveillance is used to monitor and collect visual images for the purposes of:

- protecting the buildings and contents of Roseisle Hall.
- promoting the Health and Safety of Trustees, instructors, volunteers and members of the public that use Roseisle Hall.
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- supporting the Police in a bid to deter and detect crime.
- assisting in identifying, apprehending and prosecuting offenders.

Policy

- Roseisle Hall will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
- Roseisle Hall complies with Information Commissioner's Office (ICO) CCTV Code of Practice 2017 to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
- The CCTV system will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
- 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.
- Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:
 - cover the specific area to be monitored only
 - keep privacy intrusion to a minimum
 - ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage)
 - minimise risk of damage or theft.

Location and signage



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- Cameras are sited to ensure that they cover the premises as far as is possible. Cameras are installed above main entrance, kitchen window and mower shed door
- The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the Roseisle Hall grounds.
- Signs are placed at the entrance to Roseisle Hall, at the carpark entrance and on the building windows in order to inform Trustees, instructors, volunteers and members of the public that CCTV is in operation.
- Complaints/questions about the systems should be directed to The Secretary, Roseisle Hall. Roseislehall.secretary@gmail.com

Monitoring and recording

- Cameras are monitored in a secure cupboard located at Roseisle Hall.
- Images are recorded and are viewable by the Chairperson and Vice Chairperson. Additional trustees may be authorised by the Chairperson and Vice Chairperson to monitor cameras as required e.g., the nominated trustees are on holiday
- Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g., time, date and location) is recorded reliably, and compression of data does not reduce its quality.
- Viewing monitors are password protected and switched off when not in use to prevent unauthorised use or viewing.
- The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked weekly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate. All images recorded by the CCTV System remain the property and copyright of Roseisle Hall.

Covert surveillance

Roseisle Hall will not engage in covert surveillance.

Data Protection

Roseisle Hall in its administration of its CCTV system, complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and in accordance with Data Protection Policy.

Applications for disclosure of images

- Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to The Secretary of Roseisle Hall together with proof of identification.



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- In order to locate the images on the system sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
- Where Roseisle Hall is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.
- In limited circumstances it may be appropriate to disclose images to a third party, such as the police when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- Such disclosures will be made at the discretion of the Chairperson and Vice Chairperson with reference to relevant legislation and where necessary, following advice from our legal representatives.
- A log of any disclosure made under this policy will be held by the Roseisle Hall Secretary itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
- Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
- Where information is disclosed, the disclosing officer must ensure information is transferred securely
- Images may be released to the media for purposes of identification. Any such decision to disclose will be taken in conjunction with the Police and/or other relevant law enforcement agencies.
- Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of images

- Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 28 calendar days from the date of recording. Images will be automatically overwritten or destroyed after this time.
- Where an image is required to be held in excess of the retention period, the Roseisle Hall Secretary, will be responsible for authorising such a request, and recordings will be protected against loss or held separately from the surveillance system and will be retained for 6 months following date of last action and then disposed of as per above
- Images held in excess of their retention period will be reviewed on a three monthly basis and any not required for evidentiary purposes will be deleted.
- Access to retained CCTV images is restricted to the Chairperson and Vice Chairperson and other persons as required.



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- Complaints concerning Roseisle Hall and use of its CCTV system or the disclosure of CCTV images should be made to The Secretary.
- The complaints procedure is available on the Roseisle Hall website: www.roseislehall.co.uk. When requested, anonymised information concerning complaints will be provided to the Information Commission.

Review Procedure

- There will be an annual review of the use of the CCTV system to ensure it remains necessary, proportionate and effective in meeting the stated purposes.
- As part of the review of Roseisle Hall will assess
 1. Whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation;
 2. The monitoring operation, e.g. if 24 monitoring in all camera locations is necessary or whether there is a case for reducing monitoring hours
 3. Whether there are alternative and less intrusive methods to achieve the stated purposes.

Responsibilities

- Roseisle Hall is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- Roseisle Hall is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- The Secretary of Roseisle Hall is responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.