

CCTV Policy

Background

Blakeney Harbour Association (BHA) believes the operation of a CCTV system is an important requirement to discourage and where necessary, assist with the investigation of crimes which may be committed at sites within the Blakeney Harbour area and that this is a legitimate aim of the Association on behalf of its' members and the public.

Such crimes include but may not be limited to the theft of boats or other equipment.

BHA has taken account of the impact on the privacy of individuals using the Blakeney Harbour area and believes the use of surveillance cameras is justifiable and represents the minimum practicable measure available to meet the requirement.

BHA will only use images captured by any CCTV systems installed at its request for the purpose of discouraging or investigating incidents which may relate to criminal activity and will at all times comply with the ICO Surveillance Camera Code of Practice and any relevant legislation.

Responsibility and accountability

The surveillance system and data captured by the system are the responsibility of the Trustees of BHA.

The designated individual responsible for the system on behalf of the Trustees is James Cowan.

BHA will only use surveillance systems supplied, installed and/or operated by licenced providers which meet appropriate standards and comply with relevant legislation.

Cameras and notification

BHA is committed to transparency in the use of CCTV and the capture of images.

Cameras will only be placed in locations likely to contribute to the prevention of crime or to solving crimes which may have been committed.

Notices will always be placed to notify members of the public of the presence of surveillance cameras and will include contact details to enable anyone to understand the purpose of the cameras and the policies relating to use of data or to be able to make a complaint.

Notification of the use of CCTV will be published in the Associations' Privacy Statement which will be available on the BHA website or by application to BHA.

Retention and access to data

Data will be stored securely for a maximum of 21 days except in the event of an incident when it will be retained for as long as necessary to facilitate the investigation and potential prosecution of any crime.

Images will only be used in the event of an incident which may relate to a crime and may be used to identify vehicles or individuals or to shed light on the circumstances relating to such an incident.

Data captured by any CCTV system operated by BHA may only be viewed by Trustees or the Secretary of the Association, by specific individuals agreed by the designated individual to have a

legitimate interest, or by members of law enforcement agencies, unless otherwise directed by order of court.

Any individual whose image has been captured by CCTV has the right to make a subject access request under data protection legislation and public bodies have a right to make a Freedom of Information request. Such requests shall be considered by the designated individual and Trustees in the context of the ICO CCTV Code of Practice.

System and policy review

The designated individual and Trustees will review the use of CCTV and the location of cameras at least annually. This will include consideration of whether use of CCTV remains the most appropriate intervention in the context of the legitimate interest of the Association and the invasion of the privacy of individuals.

A summary of any such reviews shall be recorded and retained by the Association.

Trustees will review this policy at least every 3 years or in the event of a relevant complaint or material change in legislation.

Policy Drafted – May 2021

Date of latest Review – January 12 2022

Appendix

ICO CCTV Code of Practice – Guiding Principles

System operators should adopt the following 12 guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.