



The Policy

Policy:	CCTV Policy – Public Space System
Approved	Management Committee
Owner:	Nuneaton Dog Training Club /Data Controller
For release under Freedom of Information?	Yes
Supporting procedures	1) CCTV Procedures 2) Data Protection Act 2018
Contact for advice:	Data Controller
Review date:	October 2019
Amendments made :	Review and updates as required.
Date and version number:	October 2019 v1.1

1. Terms and Definitions

Closed Circuit Television (CCTV) is technology which provides an effective means of identifying people, vehicles or incidents that may result in action being required by the Data Controller.

It is a proactive tool to prevent criminality aid detection and enhance everybodies health and safety

Acronyms

- APP – Authorised Professional Practice.
- DPA – Data Protection Act.
- FOI – Freedom of Information

2. Aim of Policy

This policy explains how Nuneaton Dog Training Club will uses public space CCTV system, taking into consideration national guidance and recommendations outlined in APP.

The aim of the policy is to ensure Nuneaton Dog Training Club

- Provide clear and unambiguous information on the use of CCTV viewing and recording equipment.
- Provide a framework of instructions for the use, retention and analysis of CCTV recording.
- Meet the requirements of the Data Protection Act.
- Meet the requirements of the Health and Safety at Work Act.
- Promote a safer working environment for members and any other persons who may come into contact with the CCTV recording system.
- Meet the requirements of the ICO's Surveillance Camera Code of Practice (June 2018)
- Signpost user to the national standards which Nuneaton Dog Training Club adhere to.
- Effectively use CCTV systems to obtain the best value from this asset.



3. The Policy

This policy details how Nuneaton Dog Training Club will use and operate CCTV cameras under the county-wide public space scheme. This policy is designed to enable all persons who use, or come into contact with CCTV recording equipment, to be reassured that it is being used in the correct manner and in accordance with national guidance requirements.

4. The CCTV Scheme

4.1 Scope

Nuneaton Dog Training Club is operating an overt, public space CCTV system with cameras currently located in the club house. The system incorporates best-of-breed technology which provides high-grade image quality that meets latest ICO's guidelines.

The scheme currently consists, October 2019, of 4 cameras with the potential to expand and extend camera numbers up to 8. The cameras are located in areas which have been identified as higher risk areas, with the intention of preventing and detecting crime. The list and maps of all committee approved locations can be viewed at the club premises.

4.2 Purpose

CCTV is installed by the Police and Crime Commissioner for the following purposes:

- To assist in the prevention and detection of crime
- To assist with the conduct of investigations
- To reduce the fear of crime and help people feel safe

4.3 Monitoring

The system is continually streamed to a Dedicated Monitoring Unit (DMU) operated by Nuneaton Dog Training Club where access is restricted and only permitted for authorised personnel approved by Committee.

4.4 Recording and Retention

High definition images captured on camera are recorded 24hrs per day, 365 days of the year. These images will be stored for a rolling period of 30 days, upon which they will be routinely deleted. Any images that are further required for the investigation of crime or to support incidents will be stored as evidence for as long as there is a purpose, as per the APP retention guidelines.

4.5 Third Party Access Requests and Complaints

Any external requests for footage must be submitted under a Subject Access Request. These will be processed as per the standard ICO's guide on procedure and timescales. Requests for access must be brought to the Data Controller, without undue delay and due regard to the 30 day limitation for a reply to the requester. Any member of public who has a concern about the use and operation of CCTV and who wishes to make a complaint, can do so to the Management Committee, via Nuneaton Dog Training Club Secretary.

4.6 Maintenance of the System

The CCTV scheme is a managed system, by committee members which encapsulates a full maintenance and operational checks weekly.

4.7 Legislation

The system has been installed, operated and managed in accordance with The Surveillance Camera Code of Practice 2013. This enables the Committee to demonstrate to members that we are operating best practices which are transparent and proportionate. The CCTV system will follow the principles of good practice identified in the Information Commissioners Code of Practice.



5. Equality and Privacy Analysis

An equality analysis has been completed, which identifies any potential impact of the proposal on each of the following protected groups:

- Disability
- Age
- Sex
- Sexual Orientation
- Gender reassignment
- Marriage and civil partnership
- Pregnancy and maternity
- Race
- Religion

Privacy Impact Assessments have been completed

6 Review

6.1 CCTV System Review

Compliance with the Information Commissioners Code of Practice and The Surveillance Camera Code of Practice will result in an annual audit and review of the CCTV system to ensure:

- a. that the cameras remain justified and proportionate
- b. that the scheme is still necessary and effective in achieving the purposes outlined

6.2 Policy Review

The Policy will be reviewed annually unless there is a change in legislation after being agreed at the Management Committee. The Data Controller will be responsible for reviewing the policy. The review will consider relevant statistics and comments as necessary and where available, in order to identify any trends, issues or concerns.

The Policy will also be reviewed whenever new legislation / guidance, which may have an impact, is introduced.

Making a Subject Access Request (GDPR 2018)

What should my request say?

Do include:

- a clear label for your request (eg use 'subject access request' as your email subject line or a heading for your letter);
- the date of your request;
- your name (including any aliases, if relevant);
- any other information used by the organisation to identify or distinguish you from other individuals (eg Membership Number or event you attended
- your up-to-date contact details;
- a comprehensive list of what personal data you want to access, based on what you need;
- any details, relevant dates, or search criteria that will help the organisation identify what you want; and
- how you would like to receive the information (eg by email or printed out).

Don't include:

- other information with your request, such as details about a wider issue or complaint;
- a request for all the information the organisation holds on you, unless that is what you want (if an organisation holds a lot of information about you, it could take them longer to respond, or make it more difficult for you to locate the specific information you need in their response); or
- threatening or offensive language.



[The Secretary Nuneaton Dog Training Club]

[See web page for postal address](#)

[Your name and full postal address]

[Your contact number]

[Your email address]

[The date]

Dear Nuneaton Dog Training Club

Subject access request CCTV footage

[Include your full name and other relevant details to help identify you].

Please supply the personal data you hold about me, which I am entitled to receive under data protection law, held in:

- *The CCTV camera situated at ('location?') on 23 May 2017 between 11am and 5pm; and...*

If you need any more information, please let me know as soon as possible.

[If relevant, state whether you would prefer to receive the data in a particular electronic format or printed out].

It may be helpful for you to know that data protection law requires you to respond to a request for personal data within one calendar month.

If you do not normally deal with these requests, please pass this letter to your data protection officer or relevant staff member.

If you need advice on dealing with this request, the Information Commissioner's Office can assist you. Its website is ico.org.uk, or it can be contacted on 0303 123 1113.

Yours faithfully.....
[Signature]