

Group Policy – CCTV

Introduction

This policy sets out the purpose, operation and management of the use of CCTV systems at 1st Horndean Scout Group. We consider the purpose and aims of our CCTV system, give details of the operation of the system, the considerations given to the privacy of individuals, the security of retained data and how we will handle subject access requests.

Much of this CCTV policy has been produced using guidance available from the Information Commissioner's Office and the Surveillance Camera Commissioner.

Purpose and Aims of CCTV System

The aims of the CCTV system are as follows

- To deter persons from committing crimes and provide opportunity to detect persons who do so
- To provide evidence to take action in the event of a crime being committed

The need for a CCTV solution arises due to the fact that the site is used primarily at evenings during the school term by our sections and rental users. This leaves extended periods of time where the site is unoccupied and during such times there have been incidents of unexplained damage or attempted break- in's, with a CCTV solution these can be deterred or the system can provide evidence to determine the identity and effect prosecution of the person committing the offence.

Policy and Needs Review

This policy and the need for CCTV is reviewed annually although it is not anticipated that the need for a CCTV system to be in place will change as without significant change to the usage patterns of the scout hut there will always be significant periods of time where the site is unoccupied.

Persons Operation for Operation

The charity trustees, otherwise known as the 1st Horndean Scout Group Executive Committee, have overall responsibility for the CCTV system.

The persons who hold the password to access retained footage are

- Adrian Judge (Group Chairman)
- Richard Smith (Group Scout Leader)

Description and Operation of System

The system fitted is a Hikvision system which uses a number of cameras located around the building, all connected to a single digital video recorder (DVR), which provides all control features. The CCTV system does not monitor or record any audio. Image recording is not continuous and is only started if there is a predefined amount of motion within a predefined region in view of each camera.

Cameras are sited to ensure that key access points and other areas of concern are covered whilst minimizing the capture of images of our neighbours.

Signage and Warning

Warning signs have been placed on the main gate and on the front of the HQ building to the site. The signage clearly identifies that CCTV is in operation and that 1st Horndean Scout Group is the owner of the site.

Although contact details are not given on the signage, these are detailed on different signage on the front of the HQ.

Active Monitoring

The CCTV images are not actively monitored and are only reviewed post incident. Although the system has the capability to stream its images across the internet there is no internet connection on site therefore this facility is not used.

Data Storage, Retention and Security

The CCTV system is fitted with a 2TB hard disk drive and will record until full at which point it will overwrite itself starting with the oldest footage first (it is estimated that this will be every 30 days). If access to images is required, they can be saved to an external media device to prevent accidental overwriting in the event of a delay in reviewing the footage.

The DVR is located within the HQ building with limited access to the box, meaning that physical access is tightly controlled. To review footage requires a password; the list of persons who have that password is given in this document under the heading 'Persons responsible for operation'.

Access to Retained Information

The CCTV footage is only to be accessed after an incident has occurred or a concern has been raised that falls into the remit of the aims listed in this policy or a valid subject access request has been made. Footage is not passed on to any third parties other than any relevant law enforcement agencies and our insurers (in exceptional cases).

Access to the retained footage requires a password, the list of persons who have that password is given in this document under the heading 'Persons responsible for operation'.

Change Log

Date	Version	Changed by	Comments
20/11/2020	1.0	Richard Smith/GSL	Initialisation of GDPR Fair Notice and GDPR Policy

Appendix 1 – Privacy Impact Assessment

Location of System Being Assessed	1 st Horndean Scout Group
Date of Assessment	18 th November 2020
Review Date	1 st September 2021
Name of Responsible Person/s	Group District Executive Committee

Purposes of the CCTV system	<p>The aims of the CCTV system are as follows:</p> <ul style="list-style-type: none"> • To deter persons from committing crimes and provide opportunity to detect persons who do so • To provide evidence to take action in the event of a crime being committed <p>The need for a CCTV solution arises due to the fact that the site is used primarily at evenings during the school term by our sections and rental users. Due to the COVID-19 pandemic, the use of the HQ is very limited and potential for break-ins and vandalism to take place.</p>
Can a CCTV system realistically deliver these benefits?	A CCTV solution is able provide evidence to determine the identity and effect prosecution of a person committing the offence and is a positive visual deterrent to those planning to commit a crime.
What are the views of those who will be under surveillance?	There has been no public consultation on the use of this CCTV system.
Other possible solutions	There is also motion sensitive flood lighting fitted around the main entrance to the building. This was in place prior to the CCTV system and does prove minimal deterrent.
Benefits to be gained from using CCTV	<p>The specific benefit of a CCTV solution is to ensure that persons involved in crime or attempted crime can be accurately identified or they are deterred from committing crime by the potential to be accurately identified.</p> <p>With areas that are not in view of the road and neighbours, these outcomes cannot be achieved by other means such as additional lighting as there are no persons present to witness attempts at criminal activity even if lights are on.</p>
Privacy issues arising from CCTV system	The main privacy issues arising from the use of CCTV is the capture of images of legitimate visitors/users of the site. As images are only reviewed in the event of an identified incident the impact on the privacy of these users is minimal.
Privacy by design features to reduce privacy intrusion and could any features be introduced as enhancements?	<p>To aid privacy by design, the cameras have been sited to avoid the public rights of way (main road) and neighbouring homes to the scout hut.</p> <p>Use of privacy facilities on the software is enabled to ensure that footage is not captured.</p>

Which organisations will be using the CCTV images?	The primary users of the CCTV images will 1 st Horndean Scout Group for the purposes outlined. In addition to this, if required, CCTV footage will be provided to the police and any other necessary agencies. There are no formal data sharing agreements with these agencies and the transfer of data will be protected in accordance with the group CCTV and GDPR policies.
Do images need to be able to identify individuals?	The images taken in close proximity to the building do need to be able to identify individuals. This is to ensure that any individual committing a crime can be identified.
Is the CCTV system sustainable?	<p>Other than electricity costs, which are negligible for this system there are no ongoing costs associated with its use. 1st Horndean Scout Group has sufficient reserves to be able to replace any component if it were to be required.</p> <p>Through the regular review of this impact assessment and the CCTV policy it is expected that the point at which the system needs to be upgraded will be identified.</p>
Will the CCTV system installed deliver the desired benefit now and in the future?	The system installed will deliver the desired benefit now and into the future. The system was current at the time of purchase, using the latest available technology on the market to sufficiently to identify individuals. The system will be reviewed with this impact assessment to ensure that it is fit for purpose into the future.
What future demands may arise for wider use of images and how will these be addressed?	It is considered unlikely that there will be any additional demands placed on the use of these CCTV images given the use and nature of the site though this will be reviewed with this impact assessment.

Camera Type, Make and Model	Description	Justification and Expected Use
Hikvision*	Static images, no movement and no zoom function. 1080p HD definition.	<p>Recording on motion sensor being activated.</p> <p>Used to aid the deterrence of crime and the provision of evidence in the event of a crime being committed.</p>

* Specific data of the camera types have redacted in the publicly published document to protect the integrity of the CCTV system

Camera Location	Recording	Monitoring	Assessment of Use of Equipment (Mitigations or Justifications)
This section is redacted in the publicly published document to protect the integrity of the CCTV system. For further information please contact us.			