



STAINSBY GRANGE

CCTV POLICY

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STATUS:	
DATE CREATED:	20/1/2022
VERSION:]
LAST UPDATED:	
SECURITY CLASSIFICATION:	Low

Revision History

VERSION	REVISION DATE	SECTION REVISED	REASON FOR REVISION	DESCRIPTION OF REVISION

Table of Contents

1	Policy Statement	4
2	Purpose.....	4
3	Scope	4
4	CCTV Overview.....	4
5	Objectives	5
6	Data Protection Impact Assessment.....	5
7	Signage	5
8	Privacy notice & Usage Reasons	6
9	Recording and Monitoring.....	6
10	Requests for Personal Data	6
11	Security Measures.....	7
12	Breach Management.....	7
13	Retention	7
14	Responsibilities	8

20/1/22

1 POLICY STATEMENT

Stainsby Grange (hereinafter referred to as the “**Company**”) uses CCTV surveillance “CCTV” across its business areas. The Company adheres to the UK GDPR and DPA18 and understands that the use of CCTV falls under its data protection obligations. We have developed this CCTV Policy to help ensure that where we are capturing individuals’ information, the Company complies with the UK GDPR and any other relevant statutory obligations.

In addition to this CCTV policy, we also refer to the use of CCTV within our privacy notices to ensure that all relevant individuals know and understand the reasons for CCTV use, the legal basis for processing such data and what their rights are.

2 PURPOSE

The purpose of this policy is to provide the Company's intent, objectives and procedures in relation to the use of CCTV within its business operations and to ensure that individuals whose data is captured through our use of CCTV are aware of their rights and the reasons for processing.

For the purposes of this policy, the use of CCTV refers to: -

- [Insert the types of CCTV used throughout your business and services]

Car parks, Indoor arenas, tack rooms, yards. Outdoor arena

3 SCOPE

This policy applies to all staff within the Company (*meaning permanent, fixed term, and temporary staff, any third-party representatives or sub-contractors, agency workers, volunteers, interns and agents engaged with the Company in the UK or overseas*). Adherence to this policy is mandatory and non-compliance could lead to disciplinary action.

4 CCTV OVERVIEW

The Company uses CCTV for the reasons and purposes described in this policy. **CCTV systems are located in:** -

- Car parks
- Building entrances and exits
- Indoor Arenas,
- Outdoor arena
- All Stable Yards

20/1/22

All cameras are in a visible location and area clearly signposted to ensure individuals are aware of their location. The CCTV operates on a continual, 24hr basis with the Company using **static cameras**. The Company never installs or uses CCTV in areas where privacy is to be expected (*i.e. toilets*).

5 OBJECTIVES

- To ensure that clear signs are used to notify individuals about the use of CCTV.
- To adhere to the UK GDPR and ICO CCTV Code of Practice and to have a detailed CCTV policy in place to ensure that the use of CCTV is valid, necessary and legal.
- To complete a Data Protection Impact Assessment on an annual basis to ensure that the use of CCTV is necessary and compliant.
- To appoint an employee oversight of the CCTV impact assessments, reviews, use, signage and monitoring.
- To protect **clients; employees; visitors etc** whilst in a business area or building.
- To document the reasons for using CCTV and the legal basis upon which the Company relies in any privacy notice(s).
- All images or footage produced by the CCTV are as clear as possible and are regularly reviewed to ensure that the footage is of a high resolution

6 DATA PROTECTION IMPACT ASSESSMENT

The Company has completed a Data Protection Impact Assessment (DPIA) to ensure that the use of CCTV is necessary and to assess the impact of such recordings on the individuals involved. The Company reviews the DPIA on CCTV use every **12 months** to ensure that the legal reasons for using CCTV are still valid and necessary.

The Company recognises that in some instances, the use of CCTV can be intrusive and can compromise an individuals' privacy and rights. The Company complies with the mandatory requirement to complete a Data Impact Assessment prior to using CCTV to ensure that recorded surveillance is the most appropriate and effective solution to obtain the required personal data.

When evaluating why the Company needs to use CCTV, we consider whether its use is proportionate and if there are any alternative, less invasive methods of obtaining similar data or end results.

7 SIGNAGE

The Company uses clear signage to inform individuals about the use and placement of CCTV within its business locations and/or services. Signs clearly mark the use of CCTV before an individual is able to be *recorded Entrance to buildings and entrance to site*

Where it is not obvious who is responsible for the operation or use of the CCTV, the Company has ensured that the relevant contact details are displayed on the sign(s).

8 PRIVACY NOTICE & USAGE REASONS

The Company has privacy notices for individuals and employees, both of which detail the use of CCTV (*where applicable*). To ensure compliance with the UK GDPR, the privacy notices document the Company's reasons for using CCTV, the legal basis we rely on for processing and how to request access to an individual's personal data.

- For the personal safety of visitors, employees and any other individuals within the Company grounds and buildings
- To prevent crime and protect buildings, business areas and vehicles from damage, disruption, vandalism and any other crime
- To support law enforcement agencies in the prevention, detection and prosecution of crime
- To monitor and enforce regulatory, contractual and/or legal compliance with rules and obligations
- To assist in effective dispute resolution relating to disciplinary or grievance proceedings
- To monitor and protect employees during the provision of their duties
- To monitor Liveries and lessons with regard to rules and safety with horses when needed

9 RECORDING AND MONITORING

- Location of cameras are in outdoor arena, indoor arenas, stable yards and car park
- Monitored from house but not on a 24 hour basis
- They are viewed to monitor health and safety, security and horse welfare
- access to the CCTV footage is proprietors and centre manager
- footage is stored for 14 days
- Footage is self wiping

10 REQUESTS FOR PERSONAL DATA

The Company has Subject Access Request procedures in place which are easily accessible to all individuals. The procedures document how, why and when an individual can request access to their personal data, which includes CCTV images and/or footage.

Subject Access Requests (SAR) are passed to the **proprietors** as soon as received and a record of the request is noted. The type of personal data held about the individual is checked against our

Information Audit to see what format it is held in, who else has it has been shared with and any specific timeframes for access.

SARs are always completed within 30-days and are provided free of charge. Where the individual makes the request by electronic means, we provide the information in a commonly used electronic format, unless an alternative format is requested.

11 SECURITY MEASURES

Alongside our '*Privacy by Design*' approach to protecting data, we ensure the maximum security of any CCTV footage to ensure that it is safe and secure at all times. We employ appropriate and adequate technical and organisational measures to secure CCTV data, including when it is recorded, stored, disclosed and transferred.

Below is a summary of the measures used to secure CCTV footage and data. However, our main security measures and controls are documented in our ***Information Security Policies***.

- CCTV recording equipment is secured by restricted access measures.
- Access to CCTV footage is password protected and subject to our Password Policy protocols.
- Cameras are frequently reviewed to ensure they are only capturing the necessary and required footage.
- CCTV footage is only retained for as long as it necessary and in accordance with our Data Retention Policy
- An Access Request form is complete for any legal or regulatory request to view CCTV footage.

12 BREACH MANAGEMENT

We carry out information audits to ensure that all personal data held and processed by us is accounted for and recorded, alongside risk assessments to ascertain the scope and impact a data breach could have on a data subject(s). We have implemented adequate and appropriate technical and organisational measures to ensure a level of security appropriate to the risk.

Whilst every effort and measures are taken to reduce the risk of data breaches from our CCTV, the Company has dedicated controls and procedures in place for such situations, along with the notifications to be made to the Commissioner and data subjects (*where applicable*).

Please refer to our ***Data Breach Policy & Procedures*** for specific protocols.

13 RETENTION

To ensure compliance with the UK GDPR, CCTV footage or images are never retained for longer than is necessary. The data protection impact assessment details why the use of CCTV is necessary and

the Company's reasons for processing such data. With this legal basis in mind, we ensure that all CCTV images are only retained for **14 days**

Data is deleted and/or disposed of automatically by the system. CCTV footage is deleted when there is no legitimate reason for retaining it and in accordance with our ***Data Retention Policy and Register***.

All CCTV images and footage are retained in a safe and secure manner. Please refer to our ***Information Security Program*** for further details on our security systems and measures.

14 RESPONSIBILITIES

Peter Allen has overall responsibility for CCTV use, oversight and ensuring its compliance with the UK GDPR and relevant legislation. They are responsible for reviewing and maintaining this policy and the CCTV data protection impact assessment as well as providing management information where applicable.

The appointed person is also responsible for the signage relating to any CCTV, what images or footage are captured, who it may be disclosed to and the provision of information in the privacy policy relating to the Company's use of CCTV. Peter Allen has been allocated the responsibility of CCTV footage storage, security and destruction.