



# CLOSED CIRCUIT TELEVISION (CCTV) POLICY

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Authorised By: The Chief Executive Officer

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## **1.0 Policy Statement**

### **1.1 Introduction**

This policy sets out the actions and procedures which must be followed to comply with the Data Protection Act, in respect of the use of closed circuit television (CCTV) surveillance system managed by Edinburgh Dog and Cat Home (the 'Home').

The Data Protection Act covers the processing of images of individuals caught by CCTV cameras the legislation means that legally enforceable standards apply to the collection and processing of images relating to individuals.

### **1.2 Scope**

This policy will cover all staff and visitors of the company and other persons whose image may be captured by the system.

The purpose of the CCTV system is for the:

- Prevention and detection of crime, harassment or disorder.
- Apprehension and prosecution of offenders.
- Provision of evidence in criminal proceedings.
- Interest of public and employee safety.
- Protection of property and assets.

## **2.0 Policy**

### **2.1 Equipment and Installation**

Before any installation the location of the equipment will be carefully considered. The Home will ensure that the installation complies with the Data Protection Act.

- All cameras will be located in prominent positions.
- All surveillance will be automatically recorded.

Signs will be erected on all entrance points to the premises and throughout the site to ensure that staff and visitors are aware they are entering an area that is covered by CCTV surveillance equipment.

The signs will include company contact details and the purpose for the surveillance.

## **2.2 Ownership and Operation**

The CCTV system and all recorded material and copyright are owned by the Home.

## **2.3 Recorded Images**

The images produced must be as effective as possible for the purpose for which they are intended.

Images, which are not required for the purpose for which the equipment is being used, will not be retained for longer than is necessary.

All recorded images will be stored securely within the systems hard drives, for up to 6 days when they are then automatically erased unless the images are required for evidential purposes in legal or Company disciplinary proceedings.

The systems hard drive will be stored within a locked cabinet, access to which will be controlled by the Data Protection Officer.

Evidential recordings will be electronically written on to a CD or memory stick and placed in a sealed envelope, signed and dated and held securely until completion of the proceedings.

Viewing of images will be controlled by the Data Protection Officer. Only persons authorised by the Data Protection Officer can access CCTV data.

Third parties' access and disclosure is only permitted under the control of the Data Protection Officer if it supports the purpose for the surveillance scheme.

## **2.4 Access to Live Footage and Recordings**

**Live Footage** – For operational purposes, and in accordance with the stated purposes of the system, only designated staff, trained in their duties shall have access to live footage. A list of these staff can be obtained from the Data Protection Officer but will normally comprise of all members of the Home's Senior Management Team and those designated 'on duty' for the purposes of responding to out-of-hours events.

**Recordings** – For operational purposes and in accordance with the stated purposes of the system, only designated staff shall have primary access to CCTV recordings. A list of these staff can be obtained from the Data Protection Officer but will normally comprise only members of the Home's Senior Management Team.

The Data Protection Officer or nominee may permit the viewing of CCTV recorded materials by police and other staff where this is necessary in connection with a serious occurrence, in accordance with the Data Protection Act.

Where an individual has cause to access live or recorded footage they will submit details of the access including, date, time and reason to the Data Protection Officer in writing, as soon as is practicably possible after the access has taken place. The Data Protection Officer will store the details in a CCTV Access Log.

## **2.5 Access to Images by Individuals (Data Subjects)**

The Data Protection Act gives any individual the right to request access to CCTV images. The Home's Data Protection Officer will deal with Subject Access Requests under the Home's Data Protection Policy.

## **2.6 Non-Compliance**

All employees have a role to play in enforcing the policy and are required to deal with any observed or reported breaches. Should employees feel apprehensive about their own safety in regard to addressing any breach, they should seek senior management support.

Any member of staff refusing to observe the policy will be liable to disciplinary action in accordance with the Company's Disciplinary Policy up to and including dismissal.

## **3.0 Policy Management**

### **3.1 Implementation of the Policy**

Overall responsibility for policy implementation and review rests with the Home's senior management. However, all employees are required to adhere to and support the implementation of the policy. The Home will inform all existing employees about this policy and their role in the implementation of the policy. They will also give all new employees notice of the policy on induction to the Home.

### **3.2 Monitoring Policy**

The policy will be monitored on an on-going basis, monitoring of the policy is essential to assess how effective the Home has been.

### **3.3 Reviewing Policy**

This policy will be reviewed and, if necessary, revised in the light of legislative or codes of practice and organisational changes. Improvements will be made to the management by learning from experience and the use of established reviews.

### **3.4 Policy Amendments**

Should any amendments, revisions, or updates be made to this policy it is the responsibility of the Home's senior management to see that all relevant employees receive notice. Written notice and/or training will be considered.

### **3.5 Additional Information**

If you require any additional information or clarification regarding this policy, please contact your line manager or the Data Protection Officer. In the unlikely event where you are unhappy with any decision made, you should use the Home's formal Grievance Procedure.

To the extent that the requirements of this policy reflect statutory provisions, they will alter automatically when and if those requirements are changed.

### **3.6 Contact Details**

Data Protection Officer: Mr K McLean  
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