



1st Clayton-le-Moors Scout Group

CCTV Policy

December 2024

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Scouts

CCTV Policy

At 1st Clayton-le-Moors Scout Group, we are governed by The Scout Association's GDPR Policy. When using CCTV this policy applies to our Group and its members in the practical ways described in this document.

This policy sets out the purpose, operation and management of the use of CCTV systems at 1st Clayton-le-Moors Scout Group HQ. 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 ensures compliance with the 12 principles which make up the Code of Practice provided by the Biometrics and Surveillance Camera Commissioner.



David Gerrard (Group Lead Volunteer)

1 Introduction and Purpose

1.1 Introduction

1st Clayton-le-Moors Scout Group (the “Group”) uses closed circuit television (CCTV) images to provide a safe and secure environment for volunteers, members, and visitors to the Group’s premises and to protect the Group’s property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 2018, General Data Protection Regulations 2018, and the CCTV Code of Practice.

The CCTV facility records images and audio.

1.2 Purpose of CCTV

The purposes of the Group installing and using CCTV systems include:

- To assist in the prevention of detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the Group’s premises.
- To assist in the collection of evidence in the case of significant misconduct of our volunteers or members which is against our Membership Policy.

2 CCTV System Architecture

2.1 Location of Recording Devices

Recording devices are located at strategic points on the premises, providing coverage of the external perimeter of the building as well as communal areas inside the building. Cameras are positioned so that they only cover areas within the immediate vicinity of the premises and entrance route to the premises, and minimise the capture of images of the adjacent public areas as much as possible.

All recording devices are clearly visible. The Group does not utilise hidden CCTV of any kind.

Appropriate signs are prominently displayed, both externally and internally, so that volunteers, members and other visitors are aware that they are entering an area covered by CCTV.

2.2 Recording and Retention of Images and Audio

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working correctly and that the media is producing high quality images.

The recording system is a cloud-based secure system, and all recordings are deleted on a recycling basis and, in any event, are not held for more than 180 days.

Images that are stored on, or transferred to, removable media such as memory sticks or mobile phones are erased or destroyed once the purpose of that recording is no longer relevant.

3 Access

3.1 Access to and Disclosure of Images and Audio

Access to, and disclosure of, recordings of the CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held on a secure cloud location. Access to recordings is restricted to the operators of the CCTV system and to individuals who are authorised to view them in accordance with the purposes of the system. Viewing of recordings will take place in a restricted area to which other individuals will not have access when viewing is occurring.

Disclosure of recordings to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Trustee Board are the only entity who are permitted to authorise disclosure of recordings to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided, and the reasons why they are required. If disclosure is denied, the reason will be recorded.

3.2 Individuals' Access Rights

Under the Data Protection Act 1998, individuals have the right on request to receive a copy of the personal data that the Group holds about them, including CCTV images if they are recognisable from the image.

If you want to access any CCTV recordings relating to you, you must make a written request to the Trustee Board. Your request must include the data and approximate time when the images were recorded and the location of the particular CCTV camera, so that images can be easily located and your identity can be established as the person in the images. The

Group will respond promptly and, in any case, within 29 calendar days of receiving the request.

The Group will always check the identity of the person making the request before processing it.

The Trustee Board will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Group is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

4 Implementation

4.1 Staff Training

The Group will ensure that all volunteers handling CCTV recordings are trained in the operation and administration of the CCTV system and on the impact of the Data Protection Act 1998 with regard to that system.

4.2 Responsibility

The Trustee Board is responsible for the implementation of and compliance with this policy and the operation of the CCTV system, and they will conduct a regular review of the Group's use of CCTV. Any complaints or enquiries about the operation of the Group's CCTV system should be addressed to them.

4.3 Description and Operation of the CCTV System

The system installed at the Group's HQ is a Ring system which uses a number of cameras located around the site, both inside and outside, all of which are connected securely to a cloud server operated by Ring.

Images and audio are recorded when various events are triggered. This may be detection of people, motion, or animals, as per the requirements of the Group. External CCTV recordings will only be created if these triggers occur outside of the All Saints' CE Primary School day (8:40am to 4:00pm). Within these hours no external CCTV recordings will be created or retained. Internal CCTV will record when triggered at any time while the alarm system is set.

When triggered outside of those hours, a recording is started for a short period of a few minutes. Subsequent triggers will generate additional recordings. Image and audio recording is not continuous. Live views of the CCTV are also possible, and recordings may be created at this time.

A username and password are required to access the recordings, as well as two-factor authentication for new devices. This information is retained by the Trustee Board and its authorised users.

5 Control

The Group is a registered Data Controller with the Information Commissioner's Office (ICO).
The Group can be contacted via Group@1stClaytonScouts.uk

6 References

Policy, Organisation and Rules (POR)

www.scouts.org.uk/por

Information Commissioner's Officer (ICO)

ico.org.uk

Biometrics and Surveillance Camera Commissioner

www.gov.uk/government/organisations/biometrics-and-surveillance-camera-commissioner

The Data Protection Act

www.gov.uk/data-protection





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