



## ***Hepburn Properties Ltd***

# CCTV Policy

The monitoring, recording, holding and processing of images of distinguishable individuals constitutes personal data as defined by the Data Protection Act (1998). This Policy is intended to ensure that in its use of Closed Circuit Television (CCTV) Hepburn Properties Ltd [HPL] is fully compliant with the requirements of the Data Protection Act (1998).

### **1. Responsibility**

Responsibility for implementing and monitoring the HPL CCTV Data Protection Policy sits with the CCTV Data Controller which is also HPL. Responsibility for the day-to-day management and use of authorised CCTV systems is delegated by HPL to appropriately designated staff.

**CCTV Data Controller;** Hepburn Properties Ltd [HPL] 4 Roseberry Mews, West Pelton, Co.Durham, DH9 6SX. **ICO number;** ZA624236.

### **2. Purpose**

CCTV systems are installed on sites owned by HPL for the following specific purposes only.

- To deter and detect crime, including theft and criminal damage.
- To enhance site safety and well-being of tenants and visitors on site.
- To assist HPL site management.

Where, in carrying out these purposes, images are obtained of persons committing acts of an illegal nature and/or acts which breach HPL policies and procedures, these may be used as evidence.

### **3. Installation & Maintenance**

HPL installation of CCTV systems must comply with the following guidelines:

- Cameras are not hidden from view and are sited in such a way as to ensure that they only monitor spaces intended to be covered.
- Signs are displayed so that everyone is aware that they are entering a premises / site that are covered by surveillance equipment.
- Signs indicate the purposes for which cameras are installed.
- The CCTV system is located in a locked cabinet in a secure area. Access to this cabinet is controlled by HPL. Remote access is restricted to authorised HPL personnel.
- Maintenance of the CCTV system will be carried out periodically by a party approved by HPL.

#### **4. Processing Data**

Access to, and disclosure of, images is restricted and carefully controlled, in order to safeguard the rights of individuals and also to ensure that evidence remains intact should the images be required for evidential purposes. This will be controlled by the CCTV Data Controller - HPL.

The following responsibilities apply:

- Restricting access to those staff who need to have access to recorded images for the purpose(s) for which the system was installed.
- Maintain a list of staff that have access to recorded images.
- Footage will be downloaded either remotely or on-site.
- A CCTV footage request must be completed in writing by any requester, request fee paid in advance along with the written request signed off by an authorised person from HPL.

#### **5. Access**

Persons / Parties who seek access to their personal data must submit a written request.

- Persons / Parties have the right to access images of themselves.
- All access requests are dealt with by HPL the Data Controller.
- Images will not to be disclosed to third parties without the permission of HPL the Data Controller.
- All requests from the police for access or disclosure are dealt with according to the principles of the Data Protection Act.
- All access requests incur a processing charge which must be paid in advance.

#### **6. Monitoring and Review**

This CCTV Policy will be kept under review with amendments / adjustments made when required.

July 2021