

CCTV policy

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This policy is drafted in accordance with the requirements of the General Data Protection Regulation (GDPR)

Policy statement

CODESCREEN BRAINCUB INCUBATOR LTD. uses close circuit television (“CCTV”) within its premises.

The purpose of this policy is to set out the position of CODESCREEN BRAINCUB INCUBATOR LTD. as to the management, operation and use of the CCTV at CODESCREEN BRAINCUB INCUBATOR LTD.. This policy applies to all members of CODESCREEN BRAINCUB INCUBATOR LTD. workforce, visitors to CODESCREEN BRAINCUB INCUBATOR LTD. premises and all other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- The General Data Protection Regulation (GDPR)
- Data Protection Act 2018
- CCTV Code of Practice produced by the Information Commissioner

Human Rights Act 1998

This policy sets out the position of CODESCREEN BRAINCUB INCUBATOR LTD. in relation to its use of CCTV.

Purpose of CCTV

CODESCREEN BRAINCUB INCUBATOR LTD. uses CCTV for the following purposes:

- To provide a safe and secure environment for Variable
- To prevent the loss of or damage to CODESCREEN BRAINCUB INCUBATOR LTD. buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

Description of system

CODESCREEN BRAINCUB INCUBATOR LTD. uses Fixed and mobile cameras on site.

Cameras are equipped for sound recording.

Siting of Cameras

All CCTV cameras will be sited in such a way so as to meet the purpose of CCTV operation.

Cameras will be sited in prominent positions where they are clearly visible to:

- Staff
- Pupil
- Employees
- Visitors

Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance.

CODESCREEN BRAINCUB INCUBATOR LTD. will make all reasonable efforts to ensure that areas outside of CODESCREEN BRAINCUB INCUBATOR LTD. premises are not recorded.

- Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

Cameras will not be sited in areas where individuals have a heightened expectation of privacy, such as Toilets.

Privacy Impact Assessment

Prior to the installation of any CCTV camera, or another monitoring system, a privacy impact assessment will be conducted by CODESCREEN BRAINCUB INCUBATOR LTD. to ensure that the proposed installation is compliant with legislation and ICO guidance.

CODESCREEN BRAINCUB INCUBATOR LTD. will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

Management and Access

The CCTV system will be managed/operated by CODESCREEN BRAINCUB INCUBATOR LTD. for 720 hours.

The viewing of live CCTV images will be restricted to senior members of staff with designated powers to view images for the reasons set out above.

Recorded images that are stored by the CCTV system will be restricted to access by senior members of staff with designated powers to view such images for the reasons set out above.

No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

The CCTV system is checked BIANNUALLY by appropriate staff members to ensure that it is operating effectively.

Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored only for a period of 30 days unless there is a specific purpose for which they are retained for a longer period. CODESCREEN BRAINCUB INCUBATOR LTD. will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images.

The measures in place include:

- CCTV recording system being located in restricted access areas
- The CCTV system being encrypted/password protected
- Restriction of the ability to make copies to specified members of staff
- A log of any access to the CCTV images including time and dates of access and a record of the individual accessing the images will be maintained by CODESCREEN BRAINCUB INCUBATOR LTD. .

Disclosure of Images to Data Subjects

Any individual recorded in any CCTV image is a data subject for the purpose of the Data Protection Legislation and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation.

Such a request should be considered in the context of CODESCREEN BRAINCUB INCUBATOR LTD.'s Subject Access Request Policy.

When such a request is made, CODESCREEN BRAINCUB INCUBATOR LTD.'s Data Protection Officer or appropriately nominated representative will review the CCTV footage, in respect of relevant time period where appropriate, in accordance with the request.

Suppose the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request.

CODESCREEN BRAINCUB INCUBATOR LTD.'s Data Protection Officer or appropriately nominated representative must take appropriate measures to ensure that the footage is restricted in this manner.

If the footage contains images of other individuals then CODESCREEN BRAINCUB INCUBATOR LTD. must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example, whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which set out:

- When the request was made;
- The process followed by CODESCREEN BRAINCUB INCUBATOR LTD.'s Data Protection Officer or appropriately nominated a representative in determining whether the images contained third parties;
- Whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so, to whom, when and in what format.

Disclosure of Images to Third Parties

CODESCREEN BRAINCUB INCUBATOR LTD. will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images CODESCREEN BRAINCUB INCUBATOR LTD. Data Protection Officer or appropriately nominated representative must follow the same process as above in relation to subject access requests.

Details should be obtained from the law enforcement agency as to the exact purpose of the request for the CCTV images and any particular individual of concern.

This will then enable proper consideration to be given to what should be disclosed and the potential disclosure of any third-party images.

The information above must be recorded in relation to any disclosure. If an order is granted by a court for disclosure of CCTV images, then this should be complied with.

However, very careful consideration must be given to exactly what the court order requires. If there are any concerns as to disclosure, then the Data Protection Officer should be contacted in the first instance, and appropriate legal advice may be required.

Review of Policy and CCTV System

The CCTV system and the privacy impact assessment relating to it will be reviewed Annually.

Misuse of the CCTV systems

The misuse of the CCTV system could constitute a criminal offence.

Any member of staff who breaches this policy may be subject to disciplinary action.

Complaints relating to this policy

Any complaints relating to this policy or to the CCTV system operated by the trust should be made in accordance with CODESCREEN BRAINCUB INCUBATOR LTD.'s Complaints Policy.