



POLICY ON USE OF CCTV CAMERAS WITHIN BIRCHWOOD HIGHLAND RECOVERY CENTRE

Reference Material: CCTV Code of Practice (ICO) Revised Edition 2008

The Controller of the system is Emily-Stokes-Reid, Chief Executive for Birchwood Highland.

The Controller will notify the Information Commissioner annually about the CCTV system and its purpose. The notification will include details of any disclosures that are made.

The Controller shall also ensure that all licensing requirements are met to comply with Security Industry Authority Licensing.

Birchwood Highland Recovery Centre shall ensure that relevant signage is in place advising persons that a CCTV system is in operation. This shall be visible to persons visiting, staff and Service Users within the premises. The Controller's contact details shall be displayed on the sign and updated accordingly.

All staff and Service Users must be notified, in writing, of the operation of CCTV within Birchwood Highland Recovery Centre and their permission to record their image secured.

Authorised Persons.

The Authorised Persons for Birchwood Highland are: Emily Stokes-Reid, Chief Executive; Valerie Cameron, Resources Manager; Stephen Dunphy, Service Manager at Birchwood Highland Recovery Centre; Sue Stone and Angela Wilkinson, Team Leaders at Birchwood Highland Recovery Centre.

The Authorised Persons will view the recorded images only if there has been a reported incident causing distress or damage to people or property connected to Birchwood Highland Recovery Centre.

Recorded images shall be viewed in a restricted area and only by authorised persons or persons appointed. All viewings will be noted within the Operations Log Book and reasons for such documented.

Authorised Persons will ensure that the recorded images from this CCTV are securely stored within a lockable container, where only a limited number of authorised persons may have access to them.

Access to the CCTV equipment shall be strictly limited to the Authorised named persons.

The BHRC Administrator or other authorised person shall check the CCTV camera system daily to ensure full functionality.

Location of CCTV Cameras.

See Appendix A for the location of all cameras within Birchwood Highland Recovery Centre. This Appendix is subject to quarterly review and all amendments shall be documented within 5 days in the Operations Logbook.

Retention.

The recorded images will be retained for a period not exceeding 28 days, with the exception of where a law enforcement body is investigating a crime.

All images shall be destroyed securely at the end of the retention period and their destruction recorded in the Operations Log Book.

Disclosure.

No disclosure of information or images relating to the CCTV shall be made by any person other than the Data Controller or person appointed by same.

Judgement about disclosure of images shall be made by the Data Controller or other appointed person. It shall be at their discretion to refuse any request unless there is an overriding legal obligation.

Once an image has been disclosed to any other body, they shall then become the data controller for their copy of that image. The method of disclosing images shall be secure and all disclosures recorded accordingly.

Recordings will only be made available to law enforcement agencies involved in the prevention and detection of crime, and no other third parties.

Subject Access Requests.

Individuals wishing to make a subject access request, should do so in writing to the Data Controller. All requests must be logged and subsequent request management information recorded in the relevant Log Book. All subject access requests must provide details, which allow the Data Controller to identify them as the subject of the images recorded. An administrative fee will be charged. The Data Controller will provide the requested copy of images within 40 calendar days of receiving the request.

Data Subject Notice

The data controller must give written notice either that they have complied with a notice or intends to comply with it, or, they must state the extent to which they intend to comply (if at all) and explain which parts of the notice they consider to be unjustified, if any, and why. This information must be given to the individual within 21 days of receiving the data subject notice.

Maintenance.

The operating equipment is checked daily to ensure that it is working properly (e.g. the recording media used is of an appropriate standard and that features on the equipment such as the date and time stamp are correctly set).

The maintenance contractor for the system is: Fergus Davidson, electrical contractor, 41 Dunain Road, Inverness. Tel:01463 711447 or 07778782600.

In the event of any technical problem arising with the system, the Data Controller and the electrical contractor should be notified immediately and the date/time recorded. The duration of the system being inoperable should also be recorded in the Operations Log Book.

Training.

Authorised persons will receive full training prior to operating the CCTV system and refresher training will be made available every 6 months as required.

Review

A review of the CCTV system and its purpose shall be held quarterly, relevant usage identified and documented, and all relevant documentation will be reviewed to ensure compliance with requirements.

Approved by Management Team: 30th August 2010-10-11

Approved by BOD: 5th October 2010

Glossary of terms used within the policy

Authorised person

Person named by Birchwood Highland as permitted to view images recorded on CCTV following a reported incident in or in the immediate vicinity of the Recovery Centre.

Operations log book

Log Book held securely which records dates on which CCTV images were viewed, name of person viewing the images and the purpose for which the images were viewed. Within this record a daily log sheet is maintained for the purpose of recording daily maintenance testing of the CCTV recording equipment.

All requests for access to the CCTV data will be recorded in the Log Book.

Data Controller

The Data Controller is defined as the person who has the responsibility for making a judgement on disclosure of information or images relating to the CCTV system, and complying with statutory licensing requirements.

The person this responsibility within Birchwood Highland is Emily Stokes-Reid, Chief Executive.

Subject Access Request (SAR)

An individual may choose to request access to personal data held about the subject by the Data Controller. This must be done in writing and is termed a 'Subject Access Request'.

Data Subject Notice

An individual may issue a Data Subject Notice in writing to the Data Controller to seek to prevent processing of any images held of the individual (see Data Protection Act for full details).

Operating equipment

The operating equipment which is checked daily to ensure correct operation consists of the display monitor and image recording equipment situated within the Admin office.

Maintenance contractor

The named maintenance contractor is Fergus Davidson, electrical engineer. The maintenance contractor is employed to rectify reported operating faults in the CCTV system and supply guidance/training on operating the system if required.

This policy also links with

Confidentiality policy – May 2010

Data Protection policy – July 2007

Debriefing procedures – Mar 2009

IT equipment policy – Nov 2008

Protection of Adults at Risk – Mar 2008