Ely Dog Field Ltd CCTV Policy

Summary

Ely Dog Field Ltd utilises a Closed-Circuit Television (CCTV) surveillance system. This document explains the purpose and management of the system and procedures to be followed in order to ensure that the Ely Dog Field Ltd is in line with legislation.

This policy and the procedures detailed, applies to Ely Dog Field Ltd. CCTV images are monitored and recorded in accordance with this policy.

Intro

- 1. Ely Dog Field Ltd. utilises CCTV for security, prevention of crime and to monitor activities within the field to ensure a safe environment compliant with the fields terms and conditions, and to prevent loss of or damage to Ely Dog Field.
- The CCTV system is owned by Ely Dog Field Ltd, Tower Farm, Tower Road, Little Downham, CB6 2TD and managed by the director. Ely Dog Field is the system operator & data controller, for data produced by the CCTV system, and is registered with the Information Commissioner's Office, Registration number ZB736283
- 3. The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

Purpose

- 4. This Policy governs the installation and operation of all CCTV cameras at the Ely Dog Field.
- 5. CCTV is used for the purpose of protecting the site and facilities both when the field is opened and closed, for crime prevention & detection, providing evidence to police, ensuring the safety of dogs using the field and ensuring the sites terms and conditions are adhered to allowing for the refusal of services to those who don't comply.

Scope

- 6. This policy is applicable to Ely Dog Field Director and Data Controller.
- 7. All volunteers with responsibility for processing CCTV images will have relevant skills and training and be aware of this policy.

Definitions

CCTV – closed circuit television camera.

Data controller - the natural or legal person who determines means of processing of CCTV images.

Data Protection Act 2018 (DPA) - UK data protection framework.

Policy

- 8. Ely Dog Field will operate its CCTV with respect for privacy & Human Rights.
- 9. Ely Dog Field complies with Information Commissioner's Office (ICO) CCTV Code of Practice 2017
- 10. Cameras will be used in a position whereby they primarily cover the access gates to the field, they can also be remotely operated to show areas of the field to ensure compliance with terms and conditions and to minimise risk of damage or theft. This is also to reduce the risk of harm to dogs using the dog field.

Location & Signage

- 11. Equipment position is considered to reduce the likelihood of unnecessary collateral intrusion. Coverage may include some coverage of the public road/footpath outside of the premises due to the necessity to cover the entrance, this is minimised by the cameras being set back within the premises.
- 12. There are CCTV warning signs are placed at both entrances warning that CCTV is in operation.

Monitoring and recording

- 13. The CCTV & audio is monitored by the data controller & those authorised on a remote app which works on motion detection.
- 14. The cameras can be moved remotely in order to monitor those using the site to ensure compliance with terms and conditions.
- 15. Images are stored on an app & SD card which are viewable by the data controller. Additional staff/volunteers may access cameras remotely as required.
- 16. All images recorded by the CCTV System remain the property and copyright of the Ely Dog Field Ltd.

Covert surveillance

17. Ely Dog Field will not engage in covert surveillance.

Data Protection

18. In its administration of its CCTV system, Ely Dog Field Ltd complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Data Protection Impact Assessments

- 19. Ely Dog Field CCTV has a Data Protection Impact Assessment (DPIA). Additional CCTV is subject to a renewed DPIA looking at risks related to adding to the CCTV system.
- 20. Ely dog field will aim to carry out a DPIA update every 3 years or sooner if there is any change to the system.

SAR

- 21. SAR should be submitted to Ely Dog Field Ltd via <u>elydogfield@gmail.com</u> along with ID.
- 22. Adequate detail must be provided in the SAR to allow the relevant images to be identified.
- 23. If Ely Dog Field cannot comply with a SAR without disclosing the personal data of another person who is identifiable from that information, it is not obliged to comply with the SAR unless satisfied that the individual provides consent to the disclosure, or if it is reasonable in the particular circumstances to comply without the consent of the individual.
- 24. Where necessary we can disclose images to a third party when required by law. This is in relation to prevention/detection of crime or when there is an exemption under legislation.
- 25. Such disclosures will be made at the discretion of Ely Dog Field with reference to relevant legislation.
- 26. A record of any disclosures will be kept.

Retention of images

- 27. Unless required CCTV images & audio will be retained for no longer than 1 month from the date of recording. Images will be auto-deleted at this point.
- 28. Where an image is required to be held the data controller will be responsible for authorising.
- 29. Access to retained CCTV images is restricted and authorised by data controller and other persons as required by law.

Complaints Procedure

- 30. Complaints concerning Ely Dog Field's use of its CCTV system or the disclosure of CCTV images should be made to Ely Dog Field Ltd at elydogfield@gmail.com
- 31. When requested, anonymised information concerning complaints will be provided to the Surveillance Commissioner.

Responsibilities

- 32. Ely Dog Field is responsible for operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 33. Ely Dog Field is responsible for ensuring that adequate signage is in place in line with the ICO CCTV Code of Practice.
- 34. Ely Dog Field is responsible for authorising disclosure of images to data subjects/third parties and for maintaining disclosure record.

Revision history

1	22.08.2027	N/A	Version 1
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3			