



CCTV PERSONAL INFORMATION - PRIVACY NOTICE

Halliwick Park Allotment Holders Association Limited (the Association), in addition to the [**PERSONAL INFORMATION – PRIVACY NOTICE**](#), have issued this notice to cover the use of closed-circuit television (CCTV). This policy is now in place and will be updated by the Association as required to ensure compliance with the General Data Protection Regulation (UK GDPR) and Data Protection Act 2018 (DPA 2018).

The Association uses CCTV for the prevention, identification and reduction of crime, including fly-tipping, vandalism, theft and do this by monitoring entry points and communal parts of the allotment grounds in order to provide a safe and secure environment for all plot holders.

This notice sets out how the Association collect, use, and store CCTV data.

1. Data collection and intention

The installed CCTV system is operational 24 hours a day. It is sensitive to movement and records when movement is happening. The system does not record audio i.e. conversations are not recorded.

The use of CCTV is to monitor parts of the allotment grounds for security purposes. The system will only be used in a professional, ethical and legal manner. Any use of CCTV images for other purposes is prohibited by this notice.

The CCTV system is intended for the purposes of:

- Preventing or detecting criminal activity
- Identifying and prosecuting offenders (including theft, vandalism and fly-tipping)
- Monitoring and protecting the Association's trading hut
- Protecting health and safety of plot holders
- Ensuring compliance with the terms and conditions of allotment tenancy

2. Location of the CCTV cameras

Significant effort was put to select locations for the installation of CCTV cameras, so they are as least intrusive as possible to protect the privacy of individuals.

Cameras have been installed in the communal grounds of the allotments for security purposes, and care has been taken to ensure that reasonable privacy expectations are not violated. Therefore, the cameras cover communal or public areas of the allotment premises. The cameras do not cover any part of the allotments where there is an expectation for privacy.

Displayed signage ensures that allotment tenants, allotment visitors and the public are made aware that they are entering an area with CCTV in operation.



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Signage is clearly displayed at the main entrance of the allotment site, and at the trading hut, nearby the camera locations.

3. Storage and retention of data

Data collected by the CCTV system are intended for the purposes set out above.

Maintenance checks of the CCTV system are undertaken to ensure that the system is in operation and collecting data for the purposes set out above. Supervising the access and maintenance of the CCTV system is the responsibility of the Chairman and authorised committee member(s).

CCTV data are stored on a secure location and a log of access is maintained stating who, why what and when any data was viewed or copied. Access is restricted to the Chairman and authorised committee member(s).

In certain circumstances, CCTV data may also be viewed by other individuals (i.e. police) in order to achieve the objectives, set out in this notice. In all cases, access to CCTV data will be limited to authorised individuals with a reason to know/view the data.

A log of any data extracted from the CCTV system will be maintained and such data will also be stored in a secure environment with access restricted to authorised member(s).

Data captured by the CCTV system are overwritten on a recycling basis of 30 days.

Data captured by the CCTV system may be retained longer, only if the data is required in the context of a investigation/prosecution of an issue.

When the CCTV system reaches the end of its use, is replaced or decommissioned all data will be properly erased prior to disposal.

4. Access and disclosure of images

Access to, and disclosure of data from the CCTV system is restricted to the Chairman and authorised committee member(s) and to those officials who are authorised to view them (e.g. police). A log of any data extracted from the system will be maintained.

Viewing of CCTV data will take place in a restricted area, where no unauthorised individuals(s) will have access to view them. This ensures that the personal rights of plot holders are respected and retained.

A copy of the CCTV data may be disclosed to third parties, this list includes:

- 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.
- Relevant legal representatives.



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- 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 Chairman is the only person who is permitted to authorise the disclosure of images 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.

5. Individuals' access rights

Under the UK's data protection laws, including the General Data Protection Regulation (GDPR), individuals have the right to request to receive a copy of CCTV data if they are recognisable and where the Association holds it.

Anyone, who wishes to access CCTV data relating to them, must make a written request to the Association's Secretary. Individuals wishing to request access to data need to fill in the **Subject Access Request form**.

Sufficient information must be provided to enable the retrieval of CCTV data relating to the individual making the request so that they can be identified by the administrator, this will contain the:

- Date of requested CCTV data (required for the search)
- Time period (required to search), and
- Location of the CCTV camera

This information is required so that the data can be easily located, and the requester's identity can be established as the person in the images to be passed on promptly.

The committee will aim to respond within one month of receiving a request. However, where a request is complex the committee may inform the requester of a delay and extend the one month to respond by a further two months.

The Chairman is the only person who is permitted to authorise disclosure of images.

In disclosure of an individual's data (e.g. images), images of other individuals will be obscured before such data is released. Images of third parties will be obscured, otherwise it would involve an unfair intrusion into their privacy. No one has the right to request access to CCTV images relating to other people.

If the committee is unable to comply with a request (i.e. refuse access to CCTV data) because access to data could prejudice the legal rights of other individuals or jeopardise an on-going investigation, the person requesting access to data will be advised accordingly.



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A log of the date of the disclosure along with details of who the information has been provided to (name of the person and/or the organisation they represent) and why they required it will be made by the Secretary.

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

The committee will usually not make a charge for such a request, but they may charge a reasonable fee if an individual makes a request which is manifestly unfounded or excessive or is repetitive.

6. Implementation and deployment

The Association's committee is responsible for the implementation of and compliance with this notice and the operation of the CCTV system. They will conduct a regular review of the use and processing of CCTV data and always ensure that it remains compliant with the laws regulating data protection and privacy.

The committee and anyone authorised to access the CCTV system will be trained to comply with this notice.

The committee will identify and handle any requests about the CCTV system according to this notice.

All committee members are aware of the restrictions in relation to access to, and disclosure of, recorded CCTV images.

7. Complaints

Any complaints or enquiries about the operation of the Association's CCTV system should be addressed to the Association's Secretary in writing.

8. Further Information

Further information on CCTV systems and its use is available from the following:

- ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998