

## **Introduction**

This policy sets out the purpose, operation and management of the use of CCTV systems at Invertrossachs Scout Centre. We consider the purpose and aims of our CCTV system, give details of the operation of the system, the considerations given to the privacy of individuals, the security of retained data and how we will handle subject access requests.

Much of this CCTV policy has been produced using guidance available from the Information Commissioner's Office.

## **Purpose and aims of CCTV system**

The aims of the CCTV system are as follows:

- To deter persons from committing crimes and provide opportunity to detect persons who do so
- To provide evidence to take action in the event of a crime being committed

The need for a CCTV solution arises due to the fact that the site is used primarily at weekends which leaves extended periods of time where the site is unoccupied and during such times a CCTV provides additional protections for the equipment on site by acting as a deterrent to theft and damage.

## **Policy and need review**

This policy and the need for CCTV is reviewed annually although it is not anticipated that the need for a CCTV system to be in place will change as without significant change to the usage patterns of the campsite there will always be significant periods of time where the site is unoccupied.

## **Persons responsible for operation**

The charity trustees, otherwise known as the District Executive Committee, have overall responsibility for the CCTV system.

The roles which can access retained footage are:

- District Commissioner
- Depute District Commissioner(s)
- District Chair
- Chair of the Invertrossachs Scout Centre Committee
- Invertrossachs Scout Centre Manager

## **Description and operation of system**

The system fitted is a system which uses a number of cameras located around the site, all connected to a single digital video recorder (DVR), which provides all control features. The CCTV system does not monitor or record any audio.

Cameras are sited to ensure that key access points and other areas of concern are covered whilst minimizing the capture of images of other third-party users of the site (such as those using the public rights to roam).

### **Signage and warning**

Warning signs have been placed at the site.

The existing signage clearly identifies that CCTV is in operation and Stirling and Trossachs District Scout Council is the owner of the site. Although contact details are not given on the signage, these are easily obtained through a simple online search.

### **Active monitoring**

The CCTV images are not actively monitored and will only be reviewed following an incident.

### **Data storage, retention and security**

The CCTV system is fitted with a hard disk drive and will record until full at which point it will overwrite itself starting with the oldest footage first (it is estimated that this will be every 30 days). If access to images is required they can be saved to an external media device to prevent accidental overwriting in the event of a delay in reviewing the footage.

The DVR is locked inside a cupboard to which a limited number of District personnel have access within a secure building, meaning that physical access is tightly controlled.

### **Access to retained information**

The CCTV footage is only to be accessed after an incident has occurred or a concern has been raised that falls into the remit of the aims listed in this policy or a valid subject access request has been made. Footage is not passed on to any third parties other than any relevant law enforcement agencies and our insurers (in exceptional cases).

### **Subject access requests**

Requests from data subjects to access a copy of retained CCTV images held of them will be dealt with in accordance with the District's Subject Access Request procedure which is detailed within our GDPR compliance document.

## Appendix – Data privacy impact assessment

This CCTV system and the images produced by it are controlled by Stirling and Trossachs District Scouts Executive Committee who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

We Stirling and Trossachs District Scout Executive Committee have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of members. It will not be used for other purposes.

We conduct an annual review of our use of CCTV.

Requirement	Response
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	Yes - notification was made along with the payment of the relevant fee on [date]
There is a named individual who is responsible for the operation of the system.	Yes - The management of Invertrossachs Scout Centre is delegated to a management committee. Together, the management committee chair and the centre manager take responsibility for the operation of the site.
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis	Yes – there is now equipment with a significant value stored at the Centre. Due to the rural location and prolonged periods where the Centre is not used, it has been considered proportionate to install CCTV for security purposes.
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	Yes – professionally installed system
Cameras have been sited so that they provide clear images.	Yes – professionally installed system
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	Yes – professionally installed system
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	Yes – signs have been positioned
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	Yes – the recording equipment is stored in a locked area of the Centre where access is limited to a small number
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the	Yes – once the hard drive is full, the system will automatically record over previously recorded footage

incident to be investigated.	
Except for law enforcement bodies, and our insurers (in exceptional cases).images will not be provided to third parties.	Confirmed – although we do note that other parts of the federal structure of Scouting are not considered a third party.
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.	Yes – the Executive Committee as the overall responsible body have considered this
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	Yes – the Executive Committee is aware of their responsibilities should a request be made
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	Yes – the system is professionally installed and the installer can be consulted to carry out checks and maintenance