

## Introduction

This policy sets out the purpose, operation and management of the use of CCTV systems at Pybus Scout Campsite. 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 and the Surveillance Camera Commissioner.

## 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 by Scout, Guide and Duke of Edinburgh Award groups, this leaves extended periods of time where the site is unoccupied and during such times there have been incidents of unexplained damage or attempted break-in's, with a CCTV solution these can be deterred or the system can provide evidence to determine the identity and effect prosecution of the person committing the offence.

## 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 persons who hold the password to access retained footage are:

- Shaun Jones (District Commissioner)
- Tony Moody (District Executive Committee Member & Campsite Warden)

## Description and operation of system

The system fitted is a Swann 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. Image recording is not continuous and is only started if there is a predefined amount of motion within a predefined region in view of each camera.

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

### Signage and warning

Warning signs have been placed on the main gates to the site. One of these gates must be passed through before entering the site and another is sited on the front exterior of each building. The existing signage clearly identifies that CCTV is in operation and that Stockton, Thornaby & 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 as the full name of the District and registered charity number are both given.

### Active monitoring

The CCTV images are not actively monitored and are only reviewed post incident. Although the system has the capability to stream its images across the internet there is no internet connection on site therefore this facility is not used.

### Data storage, retention and security

The CCTV system is fitted with a 1TB 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. To review footage requires a password; the list of persons who have that password is given in this document under the heading 'Persons responsible for operation'.

### 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).

Access to the retained footage requires a password, the list of persons who have that password is given in this document under the heading 'Persons responsible for operation'.

### 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 1 – Privacy Impact Assessment**

Location of system being assessed:	Pybus Scout Campsite		
Date of assessment:	30 <sup>th</sup> August 2018	Reviewed:	7 <sup>th</sup> January 2021
Next Review date:	7 <sup>th</sup> January 2022		
Name of responsible person/s:	District Executive Committee of Stockton, Thornaby & District Scout Council		

Purposes of the CCTV system	<p>The aims of the CCTV system are as follows:</p> <ul style="list-style-type: none"> <li>• To deter persons from committing crimes and provide opportunity to detect persons who do so</li> <li>• To provide evidence to take action in the event of a crime being committed</li> </ul> <p>The need for a CCTV solution arises due to the fact that the site is used primarily at weekends by Scout, Guide and Duke of Edinburgh Award groups, this leaves extended periods of time where the site is unoccupied and during such times there have been incidents of unexplained damage or attempted break- in's.</p>
Can a CCTV system realistically deliver these benefits?	A CCTV solution is able provide evidence to determine the identity and effect prosecution of a person committing the offence and is a positive visual deterrent to those planning to commit a crime.
What are the views of those who will be under surveillance?	There has been no public consultation on the use of this CCTV system. Representative consultation with the public would be incredibly difficult for such a remote property. Many different people from many different locations visit, use, pass through and pass around the site. Surveying a representative sample would not be practicable.
Other possible solutions	There is also motion sensitive flood lighting fitted around the main entrance to the building. This was in place prior to the CCTV system and did not prove to be a deterrent.
Benefits to be gained from using CCTV	The specific benefit of a CCTV solution is to ensure that persons involved in crime or attempted crime can be accurately identified or they are deterred from committing crime by the potential to be accurately identified. On a remote site such as this these outcomes cannot be achieved by other means such as additional lighting as there are no persons present to witness attempts at criminal activity even if lights are on.
Privacy issues arising from CCTV system	The main privacy issues arising from the use of CCTV is the capture of images of legitimate visitors/users of the site. As images are only reviewed in the event of an identified incident the impact on the privacy of these users is minimal,
Privacy by design features to reduce privacy intrusion and could any features be introduced as enhancements?	To aid privacy by design, the cameras have been sited to avoid the public rights of way on and around the site so far as is possible whilst still capturing images of the desired areas. It would be very difficult to introduce any other features such as privacy screens without interfering too much with the aesthetics of the site or the effective operation of the system.
Which organisations will be using the CCTV images?	The primary users of the CCTV images will be Stockton, Thornaby & District Scout Council, for the purposes outlined. In addition to this, if required, CCTV footage will be provided to the police and any other

	necessary agencies. There are no formal data sharing agreements with these agencies and the transfer of data will be protected in accordance with the District CCTV and GDPR policies.
<b>Do images need to be able to identify individuals?</b>	The images taken in close proximity to the building do need to be able to identify individuals. This is to ensure that any individual committing a crime can be identified. The camera covering the campfire circle does so purely to identify whether a vehicle is involved in any incident. This camera is sited so far away that individuals cannot be easily identified but the basic shapes of people, vehicles and equipment can.
<b>Is the CCTV system sustainable?</b>	Other than electricity costs, which are negligible for this system, there are no ongoing costs associated with its use. The District has sufficient reserves to be able to replace any component if it were to be required. Through the regular review of this impact assessment and the CCTV policy it is expected that the point at which the system needs to be upgraded will be identified.
<b>Will the CCTV system installed deliver the desired benefit now and in the future?</b>	The system installed will deliver the desired benefit now and into the future. The system was current at the time of purchase and whilst higher definition cameras are now available the ones installed are still sufficient to identify individuals. The system will be reviewed with this impact assessment to ensure that it is fit for purpose into the future.
<b>What future demands may arise for wider use of images and how will these be addressed?</b>	It is considered unlikely that there will be any additional demands placed on the use of these CCTV images given the use and nature of the site though this will be reviewed with this impact assessment.

Camera type, make and model	Description	Justification and expected use
Standard static camera Swann	Static images, no movement and no zoom function. Standard definition.	Recording on motion sensor being activated. Used to aid the deterrence of crime and the provision of evidence in the event of a crime being committed.

Camera location	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
This section is redacted in the publicly published document to protect the integrity of the CCTV system. For further information please contact us.			

### Change Log

Version	Change/s	Date Issued
v1.0	Initial draft	16 <sup>th</sup> Nov 2018
v1.1	Review – Corrections to formatting and reviewed date added to privacy impact assessment	22 <sup>nd</sup> Jan 2021