



# CCTV Policy

15 February 2023

Our ref: CCTV Policy January 2023

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## Introduction

Thurstan Hoskin Solicitors LLP “The Company” uses closed circuit television (CCTV) images to protect the Company’s property and to provide a safe and secure work environment for employees and visitors to the Company’s business premises. This policy sets out the details of how the Company will collect, use and store CCTV images. For more information on your privacy rights associated with the processing of your personal data collected through CCTV images please refer to the Company privacy notice and data protection policy.

The Company’s CCTV facility, may record both Audio & Visual however where audio is recorded it shall be made clear with a sign directly adjacent or below the device.

## Purposes of CCTV

The Company has carried out a data protection impact assessment and on the basis of its findings it considers it necessary and proportionate to install and use a CCTV system. The data collected from the system will assist in:

- Prevention or detection of crime or equivalent malpractice.
- Identification and prosecution of offenders.
- Monitoring of the security of the Company’s business premises.
- Ensuring that health and safety rules and Company procedures are being complied with.
- Identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to assist in providing relevant evidence.

## Location of cameras

Cameras are located in and around our each of our offices. They may cover the internal areas of our offices accessible to clients and members of the public, and external public spaces in the immediate vicinity of our offices.

Appropriate signs are prominently displayed so that employees, clients, customers, and other visitors are aware they are entering an area covered by CCTV.

Any external public space is specifically defined in each camera and the system is set not to begin recording when motion is detected in this area only

## Recording and retention of images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, once the hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as CDs or which are stored digitally are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 12 months. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

## Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- 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.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Authorised Management personnel from the company, or the buildings Landlord / Stakeholder.
- 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 Managing Director of the Company and/or Premises Landlord (or another senior director acting in their absence) is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

#### **Individuals' access rights**

Under the UK's data protection laws, including the General Data Protection Regulation (GDPR), individuals have the right on request to receive a copy of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to the Company's Data Protection Officer. This can be done by using this email address [info@thurstanhoskin.co.uk](mailto:info@thurstanhoskin.co.uk). The Company will usually not make a charge for such a request, but we may charge a reasonable fee if you are unable to provide the date and approximate time when the images were recorded and the location of the particular CCTV camera. Prior to release of footage we require, to ensure compliance with GDPR regulations, your photographic identity to be proven - so that your identity can be established as the person in the images. This must be supplied in the form of in-date valid Photographic ID (Passport or Photocard Driving License) - By providing your ID you agree to allow us to perform an identity check.

The Company will usually respond promptly and in any case within one month of receiving a request. However, where a request is complex or numerous

the Company may extend the one month to respond by a further two months.

The Data Protection Officer will always determine whether disclosure of your images will reveal third party information, as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Company is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

#### **Staff training**

The Company will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the laws regulating data protection and privacy with regard to that system.

#### **Implementation**

The Company's Data Protection Officer is responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of the Company's use and processing of CCTV images and ensure that at all times it remains compliant with the laws regulating data protection and privacy. Any complaints or enquiries about the operation of the Company's CCTV system should be addressed to [info@thurstanhoskin.co.uk](mailto:info@thurstanhoskin.co.uk) or by calling 01209 213 646 and asking for the Data Protection Officer.

#### **Data Protection**

The Company will process the personal data collected in connection with the operation of the CCTV policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of this data will constitute a data breach and should be reported immediately to the Company's Data Protection Officer in accordance with the Company's data protection policy. Reported data breaches will be investigated and may lead to sanctions under the Company's disciplinary procedure.

DPO: Barbara Archer  
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