

BERNESLAI HOMES POLICIES & PLANS



GREAT PLACE, GREAT PEOPLE, GREAT COMPANY

Document Control

Organisation	Berneslai Homes
Title	CCTV Policy
Author	Performance and Information Manager
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Review date	Two years post approval date
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Applicable to	Staff, Contractors, Board Members, Tenants, Applicants, Members of the Public
Regulatory Framework	Data Protection Act 2018; UK GDPR

Revision History

Date	Version	Author	Comments
March 2018	0.1	<i>Performance and Information Manager</i>	<i>First draft</i>
18.05.18	1.0	<i>Performance and Information Manager</i>	<i>Published</i>
29.11.21	1.1	<i>Data Protection Coordinator</i>	<i>Updated and reformatted</i>
20.12.22	1.2	<i>Data Protection Coordinator</i>	<i>Reviewed, no changes required</i>
12/12/24	1.3	<i>Data Protection Coordinator</i>	<i>3 new CCTV locations added to policy and clarity to retention.</i>

Consultation and distribution

Type	Details
Consultation	<i>Senior Management Team, Data Protection Officer</i>
Distribution	<i>Staff, Contractors, Board Members, Tenants, Applicants, Members of the Public</i>

CCTV Privacy Notice

Does Berneslai Homes operate CCTV?

Berneslai Homes operates 15 CCTV surveillance systems at our premises, notably within designated independent living schemes, at specific residential sites and at our construction services depot.

A full list of locations is provided at the end of this policy.

All CCTV images are recorded and stored locally at each site. Signage is prominently placed at strategic points to inform staff, visitors and members of the public that a CCTV installation is in use and includes contact details for further information.

The systems are intended to produce clear images which are appropriate for the purposes stated below.

Please note that this CCTV privacy notice has been drawn up in accordance with the advisory guidance contained within the Information Commissioner's CCTV Code of Practice and the Surveillance Camera Commissioner's Code of Practice. We recognise that your personal information is important to you, and we take our responsibilities for ensuring that we collect and manage it proportionately, correctly and safely very seriously.

What are the purposes for using CCTV?

The organisation's registered purpose for processing personal data through use of our CCTV system is:

- To assist in the prevention, investigation and detection of crime
- To provide scheme residents and visitors with a greater feeling of community safety and security
- To assist with the apprehension and prosecution of offenders
- To enhance the safety of employees and the public
- To safeguard vulnerable individuals, such as our scheme residents
- To provide evidential material for court or committee proceedings
- To reduce incidents of public disorder and anti-social behaviour
- To evidence in investigations of gross misconduct (including protecting employees, contractors or suppliers from allegations)
- To protect property
- To prevent and respond effectively to all forms of possible harassment and disorder
- For the defence of its employees, contractors or suppliers with regards to legal or insurance claims.

What are our Lawful Grounds

Our lawful grounds for using this information are:

- It is in the public interest
- It is in the legitimate interest of those under surveillance

Who do you share your information with?

We may disclose your information to others but only where this is necessary to comply with our legal obligations or as permitted by Data Protection legislation. Where necessary, therefore, we may share it with the data subjects, employees of Berneslai Homes and the Barnsley Metropolitan Brough Council, the system's maintenance contractors and other public service bodies, including the police, fire and rescue services and courts, as well as third-party insurance companies.

The reasons why we may share your data with other public bodies are as follows:

- To protect vulnerable individuals who may be at risk of harm or abuse
- For the prevention and or detection of crime
- Where necessary to protect individuals from the risk of harm or injury; and
- Where otherwise permitted under the General Data Protection legislation.

We will only disclose your sensitive or confidential information to a third party if we are legally required to do so, or where we have good reason to believe that failing to share the information would put you or someone else at risk of harm.

How long does Berneslai Homes store CCTV images and is it secure?

We will not keep your information for longer than is required by law. In most cases CCTV images will be deleted after 30 days unless there is a legal requirement for us to keep it longer or the system is unable to store for 30 days or longer.

Images captured by the system are recorded continuously and may also be monitored in real time. Images displayed on monitors are not visible from outside the area where the monitor is sited and access to the area is limited to staff with delegated and authorised access.

All staff with responsibility for CCTV are made aware of the sensitivity of handling CCTV images and recordings. All those staff are fully briefed and trained in all aspects of the operational and administrative functions of their system.

Who to make requests for access?

The rights that you have depend on the grounds upon which we collected your information.

Anyone who believes that they have been filmed by the system can request a copy of the recording, subject to any restrictions covered by Data Protection law ("subject access request"). Data subjects also have the right to request that inaccurate data be corrected or erased. However, disclosure of recorded material will only be made to third parties in accordance with the purposes of the system and in compliance with current UK Data Protection law.

Subject Access Requests should be made using the “Application For Information CCTV Images” form and sent to BHdataprotection@berneslaihomes.co.uk or by letter to:

Head of Governance and Strategy, Berneslai Homes, PO Box 627, Barnsley, S70 9FZ

List of CCTV Locations

Location	Address
Albion House	Union street S70 1JT
Britannia House	Union Street S70 1JW
Buckley House	Union Street S70 1JS
Carlton Depot	Industry Road Carlton Barnsley S71 3PQ
Churchfields	Churchfields Close Barnsley S70 2HX
Church St Close	Church Street Close Thurnscoe Rotherham S63 0QT
Glebe Court	Westwood New Road Tankersley, Barnsley S75 3DG
Heather Court	Carrfield Lane Bolton on Dearne S63 8EU
Hudsons Haven	Storeys Gate Wombwell Barnsley S73 8EZ

King Street	Off Waltham Street Barnsley S70 1JA
Pendon House	Sycamore Walk Penistone, S36 6FW
Saville Court	Tranmoor Court Off Tinker Lane Hoyland Common Barnsley S74 0NZ
Shipcroft	Off Gower Street Wombwell Barnsley S73 0HU
Willowcroft	South Drive Bolton on Dearne S63 8IF
Woodhall Flats	Barnsley Road, Darfield , Barnsley S73 9EN