

Middlezoy Village Hall – CCTV Policy & Code of Practice

1. Purpose & Legal Basis

This policy governs the operation of the Closed-Circuit Television (CCTV) system at Middlezoy Village Hall, managed by the Board of Trustees (Paul Baker and Jamie Garroch).

The system is operated to:

- Enhance the safety and security of hall hirers, visitors, volunteers, and trustees.
- Protect hall property and premises against theft, vandalism, and unauthorised access.
- Assist law enforcement agencies in the prevention, detection, and prosecution of crime.

The legal basis for processing personal data (image recordings) under UK GDPR is **Legitimate Interests** (Article 6(1)(f)).

2. System Overview & Camera Placement

- **Camera Locations:** Cameras are strictly positioned to cover public entry points, external perimeters, and common areas (e.g., main hall entrance, car park and at the rear of the hall).
 - **Privacy Controls:** No cameras are installed in areas where individuals have a reasonable expectation of privacy, such as toilets, changing rooms, or kitchen private areas.
 - **Signage:** Clear, prominent signs are displayed at all entrances and near camera locations informing visitors that CCTV is in operation, the purpose of the system, and contact details for the Data Controller.
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3. System Administration & Access Controls

- **System Management:** Day-to-day administration is restricted to designated named trustees/officers: Paul Baker - Chairman, Eileen Havard - Treasurer, Louise Batstone - Bookings Secretary, Jamie Garroch - Trustee.
 - **Access Credentials:** Passwords, administrative controls, and mobile/remote monitoring apps are strictly limited to authorised individuals and must not be shared.
 - **System Auditing:** Access logs are maintained to record every instance in which footage is viewed, exported, or downloaded.
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4. Data Storage & Retention

- **Retention Window:** Recorded footage is automatically overwritten after 30 days, unless retained for an active incident investigation or law enforcement request.

- **Storage Security:** Local recording hardware (DVR/NVR) is housed in a secure, locked cabinet. Cloud backups (if applicable) must feature end-to-end encryption.
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5. Disclosure of Footage

- **Third-Party Requests:** Footage will not be disclosed to third parties except:
 1. To law enforcement agencies (Police) where required for crime investigation.
 2. To insurance bodies in relation to formal claims.
 3. Under a valid court order or statutory requirement.
 - **Subject Access Requests (SARs):** Individuals have the right to request access to CCTV footage of themselves. Requests must be submitted in writing to the Chairman email pb9857754@gmail.com. Requests will be handled within 1 calendar month in accordance with UK GDPR. Images of third parties will be redacted prior to disclosure.
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6. Review & Maintenance

This policy and the physical camera positioning will be reviewed annually by the Board of Trustees to ensure ongoing compliance, necessity, and operational effectiveness.

- **Date Adopted:** 8th September 2026
- **Next Review Date:** September 2027
- **Contact Email:** pb9857754@gmail.com