

Coin Street CCTV and BW Camera Policy

Coin Street Community Builders Limited (“CSCB”, “we”, “us”, “our”) uses Surveillance systems such as CCTV and body-worn (“BW”) cameras to view and record individuals on and around our premises to maintain a safe environment for our tenants, service users, staff and visitors. We are the data controller in respect of the personal data captured by our CCTV and BW cameras.

We are committed to keeping personal data safe and meeting our responsibilities under data protection law. This CCTV and BW camera policy gives you detailed information about the processes we follow when using our Surveillance systems, including how we collect, store, use and handle personal data in this context. The policy also sets out how you can let us know if you would like us to change how we manage your personal data as part of our Surveillance systems. For information about how we process personal data beyond our Surveillance systems (e.g. as part of the services and support we provide), please see our broader Privacy Policy [here](#).

We have engaged CIS Security Limited, as our data processor to use CCTV and BW cameras to process personal data on our behalf. We are a registered data controller with the Information Commissioner’s Office (the “ICO”).

Please see the Definitions section below for more information about some of the terms used in this Policy.

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1. About this policy

The purpose of this policy is to:

- a) outline why and how we will use CCTV and BW cameras, and how we will process personal data recorded by CCTV and BW cameras;
- b) ensure that the legal rights of individuals captured by CCTV and BW cameras, including in relation to their personal data, are recognised and respected; and
- c) explain how individuals captured by CCTV and BW cameras can exercise their data subject rights.

2. Who does this policy apply to?

This policy applies to our tenants, service users, employees, contractors, volunteers, members, visitors and other people who may from time to time visit our premises.

3. Who is responsible for this policy?

CSCB has overall responsibility for the effective operation of this policy. This policy is reviewed

4. Annually. Definitions

CCTV	means fixed and domed cameras designed to capture and record images or individuals and property;
Body-worn (“BW”) cameras	means cameras that are worn by a person and are often attached onto the front of clothing or a uniform. These devices are capable of recording both visual and audio information.
Data controller	means an organisation which, alone or jointly with others, determines the purposes and means of the processing of personal data;
Data processor	means an organisation which processes personal data on behalf of a data controller;
Data subject	means individuals whose personal data is captured using our Surveillance systems;
ICO	means the UK Information Commissioner’s Office;
Personal data	means any information relating to an identified or identifiable natural person;
Processing	means any operation or set of operations performed on personal data or sets of personal data, including collection, recording, structuring, storage, adaption, retrieval, use, disclosure and erasure;
Surveillance systems	means any devices or systems designed to monitor or record images, video and/or audio of individuals or information relating to individuals, including CCTV systems and body worn cameras.

5. Reasons for our use of Surveillance Systems

We use CCTV in the public areas of our premises and BW cameras are used by our security staff to:

- prevent crime and protect our buildings and assets from damage, disruption and vandalism;
- for the personal safety of our staff, contractors volunteers, visitors and other members of the public; and
- to support law enforcement bodies in the prevention, detection and prosecution of crime.

This list is not exhaustive, and other purposes may be or become relevant.

6. Monitoring

Staff using both CCTV and BW cameras are given appropriate training to ensure that they understand and observe the legal requirements relating to the processing of personal data.

A. CCTV

Our CCTV cameras continually record activities in all areas of our premises, including our carparks and grounds. However, our CCTV cameras are not installed in areas of our premises where there is a reasonable expectation of privacy, including:

- first aid rooms;
- bathrooms;
- changing rooms;
- feeding rooms.

Our CCTV camera locations have been chosen to minimise viewing of spaces not relevant to our purposes for monitoring. As far as possible, our CCTV cameras will not focus on private homes, gardens or other areas of private property.

Our CCTV cameras are not used to record sound.

CCTV images are monitored by authorised personnel 24 hours a day.

B. BW cameras

BW cameras may be used by staff from our security services provider CIS Security Limited. BW cameras are used to record events and interactions between these staff members and other individuals (including members of the public) when necessary.

Our BW cameras record both audio and video.

7. How we operate our Surveillance systems

A. CCTV

We have displayed signs around our premises to alert individuals that their image may be recorded

Live feeds from our CCTV cameras are only monitored where it is reasonably necessary for us to do so, for example to protect health and safety.

Live feeds from our CCTV cameras and recorded images are only viewed by appropriate members of staff whose role requires them to have access to such data. Recorded images will only be viewed in designated, secure offices.

B. BW cameras

BW cameras are carried by relevant CIS Security Limited staff during patrol and are used in the event of an incident or near miss. The BW cameras should be clearly visible. An announcement is made before the BW camera is switched on.

BW camera footage will only be viewed in designated, secure offices.

8. Use of personal data gathered by our Surveillance systems

Personal data recorded by our CCTV and BW cameras is stored in a secure manner on a standalone server located on our premises. Data is transmitted from the CCTV and BW cameras to our server via hardwired network communications. The data is encrypted where it is possible to do so.

9. Retention and erasure of personal data gathered by our Surveillance systems

Bookmarked, saved, CCTV footage stored on our server will be retained for as long as it is necessary for us to process the personal data it contains. Exactly how long footage is retained for will vary according to the purpose for which it is being recorded. All other footage will be deleted after 30 days unless we have a reason to retain it for longer. We maintain a comprehensive log of when personal data is deleted.

10. Use of additional surveillance systems

Prior to introducing any new Surveillance system, including placing a new CCTV camera in any location, we will carefully consider whether this is appropriate by carrying out a data protection impact assessment (“**DPIA**”).

A DPIA will assist us in deciding whether any changes to the Surveillance systems are necessary and proportionate in the circumstances, including whether any limitations should be placed on their use. We will consider the impact any change to the Surveillance system would have on individuals’ right to privacy and whether the nature of the problem we are seeking to address at the time outweighs that impact.

No CCTV cameras will be placed where there is an expectation of privacy (for example, changing rooms or bathrooms) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious and specific concerns.

11. Covert monitoring

We do not engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place), except in cases of criminal activity, or cases where there are strong reasons for suspecting criminal activity.

12. Requests for disclosure

We may voluntarily share personal data appearing in CCTV and/or BW camera footage with third parties where we consider that it is reasonably necessary for any of the purposes set out in section 5 above.

This may include disclosing footage to the police where we consider that the footage depicts a crime or other unlawful behaviour.

Where we receive a disclosure request from a third party, personal data will not normally be released unless satisfactory evidence is provided that the footage is required for legal proceedings or under a court order.

We will maintain a record of all disclosures of CCTV and/or BW camera footage.

No CCTV footage will ever be posted online or disclosed to the media.

13. Data subject access requests

Individuals have a right to make a request to access their personal data, which may include CCTV and/or BW camera footage. If you wish to exercise this right, please ensure that any requests you make for copies of recorded CCTV and/or BW camera footage include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual. This will enable us to locate the relevant footage.

We reserve the right to obscure images of third parties (through blurring or redaction) when disclosing CCTV and/or BW camera footage as part of a data subject access request, where we consider it necessary to do so. The cost for redaction third party images will be past on to the requester.

14. Your rights

Under certain privacy laws, you have rights relating to your personal information. You may have a right to the following:

- to request access to the personal information we hold about you (as part of a data subject access request, per section 13 above);
- to request that we rectify or erase your personal information under there is an existing investigation by the emergency services or a court order/proceedings;
- to request that we restrict the processing of your personal information;
- to object to our processing of your personal information in certain circumstances;
- under certain circumstances, to ask us to port personal information about you that you have provided to us to you or to a third party; and
- where we previously obtained your consent, to withdraw consent to processing your personal information.

To exercise these rights, contact us via the “Contact us” section below. Please be aware that we may be unable to provide these rights to you under certain circumstances, for example if we are legally prevented from doing so or can rely on exemptions.

Additionally, you have the right to lodge a complaint against us, which you can do by contacting the supervisory authority in your country of residence. In the UK, this is the Information Commissioner’s Office at www.ico.org.uk/concerns.

15. Updates to this notice

This notice may change from time to time – for example, to take into account changes at our organisation or to reflect changes in regulation or legislation. It was last updated on [date].

16. Contact us

If you have any questions or concerns about this notice or the way in which we handle your personal data, please email privacy@coinstreet.org
You can also contact us at the following address:

Coin Street Community Builders
108 Stamford Street
London SE1 9NH