John Hodges' Trust for Harpsden Hall
Registered Charity No 304312

CCTV Policy

Introduction

Harpsden Village Hall (HVH) is run by John Hodges' Trust for Harpsden Hall ("JHTHH"), a registered charity No 304312. Closed circuit television ("CCTV") is installed externally at HVH. Cameras are located at various places on the premises, and images from the cameras are recorded digitally and retained for up to 90 days. This document details the policy and procedures used to control the management, operation, use and confidentiality of the CCTV system.
NB There are no cameras installed inside any of the hall buildings.

Purpose & Objectives

1. The purposes and objectives of the CCTV system are:

    - to maintain the security of the premises
    - to deter, detect and prevent crime, vandalism and anti-social behaviour
    - to provide a safe and secure environment for volunteers, staff, hirers, visitors and contractors
    - to assist Law Enforcement Agencies to carry out their lawful duties.

2. This use of CCTV falls within the scope of The Data Protection Act 2018 and The General Data Protection Regulation 2018. JHTHH has applied the recommendations included in the Information Commissioner's Office ("ICO") CCTV Guidance to ensure that it is used responsibly.

Warning Signs

A CCTV warning sign is clearly and prominently displayed at the entrance of the HVH front car park. The sign includes details of the "Data Controller" who has responsibility for the system.

Siting the Cameras and Coverage

The planning and design have endeavoured to ensure that the CCTV system gives maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Cameras have been sited carefully so that they only capture images relevant to the purposes for which they are installed (described in "Purpose & Objectives" above) and care has been taken to ensure that reasonable privacy expectations are not violated. Every effort has been made by JHTHH to position cameras so that their coverage is restricted to the HVH premises which may include public areas.

The cameras are sited on the main HVH building overlooking the entrance to the car park and the rear car park area and the sheds.

Storage and Retention of CCTV images

Recorded data is stored automatically for up to 90 days on a recorder which is secured within HVH and to which only the JHTHH General Manager and HVH Hall Manager have access. Recorded data

will be stored in a way that ensures the security and integrity of the image and allows specific times and dates to be identified.

Normally, recorded data will not be retained for longer than 90 days. On occasion, images may need to be retained longer where, for example, an incident has been identified or a Subject Access Request (SAR) has been made or time is required to enable Law Enforcement Agencies to collect relevant images or the Law Enforcement Agencies are investigating a crime and ask for images to be preserved to afford them the opportunity to view the information as part of an active crime investigation. All retained images will be stored securely.

Access to CCTV Images and Disclosure

Access to recorded images is restricted to the JHTHH General Manager (who is the Data Controller registered with the Information Commissioner's Office) and the HVH Hall Manager. Disclosure of information will be controlled consistent with the purpose(s) for which the CCTV system has been established. Once information is disclosed to a Law Enforcement Agency, they will become data controller for the copy which they hold.

The following guidelines will be adhered to in relation to the disclosure of images:

1. The disclosure of images will be in line with the above Objectives and will be controlled under the supervision of the Data Controller or his/her deputy;
2. A log will be maintained itemising the date, time(s), camera, person copying, person receiving and reason for the disclosure;
3. The appropriate disclosure documentation from the Law Enforcement Agencies will be filed for future reference;
4. Images will not be forwarded to the media for entertainment purposes or be placed on the internet;
5. Images will not be copied in any way, eg photographed, downloaded or printed for use other than described in the objectives;
6. Images will only be released to the media for identification purposes in liaison with the Law Enforcement Agencies;
7. The method of disclosing images should be secure to ensure that they are only seen by the intended recipient; and
8. Images of third parties not relevant to the investigation should be obscured where possible to prevent unnecessary identification.

Subject Access Requests

Individuals have the right to request access to CCTV footage relating to themselves under The General Data Protection Regulation.

All requests for access should be made by e-mail or in writing to the JHTHH General Manager providing sufficient information to enable the footage relating to them to be identified, i.e. date, time and location. JHTHH will respond to requests within 30 days of receiving the written request.

All requests for access are recorded. If disclosure is denied, the reason is documented and the individual will be informed within no more than 30 days of the reason and their right to complain to a statutory authority. JHTHH reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

A fee of £20 may be charged for a Subject Access Request, depending on circumstances.

Complaints

Enquiries or complaints about the operation of HVH's CCTV system should be directed to the JHTHH General Manager by email trust@harpsdenhall.org.uk.

Review

This policy will be reviewed at least annually by the JHTHH Trustees or when new legislation requires this policy to be updated. The **CCTV Notice** appended to this policy forms a checklist for the JHTHH Trustees.

HARPSDEN VILLAGE HALL (HVH)

CCTV NOTICE

The CCTV system installed at Harpsden Village Hall and the images produced by it are controlled by the JHTHH General manager and HVH Hall Manager who are responsible for how the system is used. Day-to-day operational responsibility lies with the HVH Hall Manager who reports directly to the JHTHH Trustees.

The Trustees have considered the need for using CCTV and have decided that it is required for the prevention and detection of crime and for protecting the safety and security of HVH volunteers, staff, hirers, visitors and contractors. It will not be used for other purposes. An annual review of the use of CCTV will be conducted.

Date of Review: 20 October 2026

Date of Next Review: October 2027

Each of the **Criteria** listed below has been checked and confirmed by the JHTHH Trustees:

- Notification has been submitted to the Information Commissioner's Officer (ICO) and the next renewal date is recorded.
- There is a named individual who is responsible for the operation of the system.
- The purpose & objectives of the CCTV system have been clearly defined, and installing cameras is the best solution. This decision should be reviewed at least annually.
- A system has been chosen which produces clear images which the Law Enforcement Agencies can use to investigate crime, and these can easily be taken from the system when required.
- Cameras have been sited so that they provide clear images.
- Cameras have been positioned to avoid capturing the images of persons not visiting the premises.
- There are visible signs showing that CCTV is in operation, and who is responsible for installing and maintaining the system and HVH contact details.
- Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.
- The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.

- Except for Law Enforcement Agencies and in response to SARs, images will not be provided to third parties.
- The potential impact on individuals' privacy has been identified and taken into account in the use of the system.
- The organisation knows how to respond to individuals making requests (SARs) for copies of their own images.
- Regular checks are carried out to ensure that the system is working properly and produces high-quality images.

This policy was first published in October of 2026.