

CCTV Code of Practice for Cheltenham Town Hall Garden Bar v2 April 2014

This code of practice has been compiled using the principles and definitions laid out in the main [Cheltenham Borough Council Policy](#).

This Code along with Policy above gives detail and provides guidance on the appropriate and effective use of surveillance camera systems and in particular how it meets the requirements of;

- [the Data Protection Act 1998. \(1998 Act\)](#)
- [the Regulation of Investigatory Powers Act 2000. \(2000 Act\)](#)
- [the Protection of Freedoms Act 2012. \(2012 Act\)](#)
- [Information Commissioners CCTV Code of Practice](#)
- [Surveillance Commissioners, Surveillance Camera Code of Practice](#)
- Information Security Policy
- Data Protection Policy
- Guidance and processes in relation to The Regulation of Investigatory Powers Act (RIPA)

1.1. Management of the scheme

- 1.1 A privacy impact assessment has been carried out to assess the need and requirements of CCTV systems within Cheltenham Town Hall garden bar and its associated facilities. Cameras have been sited to capture images which are relevant to the protection of the business and customers of the Garden Bar. This assessment is reviewed on an annual basis by the Entertainment & Business Manager/Operations Manager.
- 1.2 There are 8 cameras covering the licensed area including the bar, Skillicorne Gardens and the walkway between the Town hall and the Quadrangle (leading to the public toilets). They are sited to capture images which are relevant to the operation of the business. Details of these and their locations are in appendix A
- 1.3 The scheme will be operated using overt cameras which are sited so as not to intrude unreasonably on members of the public or staff. The CCTV scheme seeks to comply with both the Data Protection Act 1988 and the Commissioners code of practice.
- 1.4 The Garden Bar owners and users of the system will treat any viewed and/or recorded material as being confidential.
- 1.5 Staff who have authorised access are aware of the purpose(s) for which the scheme has been established and that the CCTV equipment is only used to achieve the identified purposes which are the detection and prevention of crime and the prosecution of offenders.

2.0 Scheme and Signage

- 2.1 This scheme aims to provide surveillance of the public areas in and around The Garden Bar in order to fulfil the purposes of the scheme as listed above. The area protected by CCTV will be indicated by the presence of signs. The signs will be placed so that the public are aware that they are entering a zone which is covered by surveillance equipment. The signs will state the organization responsible for the scheme (Cheltenham Town Hall), the purposes of the scheme (Crime prevention and public safety) and a contact telephone number (01242 521621)
- 2.2 Data will not be held for longer than necessary and disposal of information will be regulated by the Operations Manager. The disposal of records happens as part of a managed process and is adequately documented within the service document retention schedule.

2.3 Point of contact

- 2.4 The Code of Practice for The Garden Bar informs the public on how to make contact with the owners of the scheme. For additional information write to: Operations Manager, Cheltenham Town Hall, Imperial Square, Cheltenham GL50 1QA

3.0 Release of information to the public

- 3.1 Information will be released to third parties; The Police or any other authorised organisation, which can show legitimate reasons for access. They will be required to request any information with reasons in writing and identify themselves.
- 3.2 Information will be released if the reasons are deemed acceptable, the request and release of information complies with current legislation and on condition that the information is not used for any other purpose than that specified.
- 3.3 Individuals may request to view information concerning them held on record in accordance with the Data Protection Act 1998.
- 3.4 Applications must be in the form of a CCTV Subject Access Request - available on the Cheltenham Borough Council transparency website

4.0 Release of information to statutory prosecuting bodies

- 4.1 Requests for information will be dealt with according to Section 29 & 35 of The Data Protection Act 1998
- 4.2 Applications must be in the form of a CCTV Subject Access Request - available on the main Cheltenham Borough Council website

5.0 System Registration

- 5.1 All Council systems must be registered with the Information Commissioner's Office (ICO) and it is the responsibility of service managers to ensure that these are kept up to date. Any amendments to the scheme that result in the need to update the ICO register must be forwarded to the Customer Relations Team.

6.0 Accountability

- 6.1 Cheltenham Town Hall and Cheltenham Borough Council support the principle that the community at large should be satisfied that the Public CCTV systems are being used, managed and controlled in a responsible and accountable manner and that in order to meet this objective there will be independent assessment and scrutiny.
- 6.2 A member of the public wishing to make a complaint about the system may do so through the Cheltenham Borough Council complaints procedure or contacting Cheltenham Town Hall directly by writing to the Entertainment & Business Manager.
- 6.3 A copy of the Code of Practice will be made available to anyone on request by contacting either the (Entertainment & Business Manager or Operations Manager at Cheltenham Town Hall)

7.0 CCTV Control Management and Operation

- 7.1 The system is located in a locked office.
- 7.2 Only those persons with a legitimate purpose will be permitted to access the recording and monitoring system.
- 7.3 Access to the system may be required by

- Authorised Personnel (including Council Representatives)
- Police officers to view a particular incident for intelligence or evidential purposes. These visits will take place by prior appointment.
- Engineers of our nominated contractor for maintenance purposes

7.4 Inspectors/Auditors may visit the monitoring and recording facility without prior appointment.

7.5 All visits by authorised persons requiring access to the system will be logged.

8.0 Observation and recording of incidents

8.1 Recording will be 24 hours per day, 7 days a week. The system will be monitored on the basis of operational need. Images will be held for 14 days and then over recorded.

9.0 Privacy And Disclosure Issues

9.1 Cameras will not be used to infringe individual's rights of privacy. The cameras are sited where they will not be capable of viewing any private areas.

9.2 All employees will be aware of the restrictions set out in this Code of Practice in relation to access to and disclosure of recorded images

9.3 Images not required for the purposes of the scheme will not be retained longer than necessary

9.4 The Operations Manager will only disclose to third parties who intend processing the data for purposes which are deemed compatible with the objectives of the CCTV system

9.5 Monitors displaying images from areas in which individuals would have an expectation of privacy will not be viewed by anyone other than authorised persons.

9.6 Recorded material will only be used for the purposes defined in this policy.

9.7 Access to recorded material will be in accordance with policy and procedures.

9.8 Information will not be disclosed for commercial or entertainment purposes.

9.9 Access to recorded images will be restricted to staff that require access in order to achieve the purpose(s) defined in this policy.

9.10 Viewing of the recorded images will take place in a restricted area.

10.0 Access to recorded images

10.1 Access to recorded images will be restricted to the Entertainment & Business/Operations Manager or designated member of staff who will decide whether to allow requests for access by third parties in accordance with the disclosure policy. Those requests must be in writing.

11.0 Monitoring employees

11.1 The system will record images of employees during the course of the general surveillance. The main purpose of the CCTV is to prevent and detect crime and it is not designed to be used for monitoring the amount of work done or compliance with company procedures. However if there is a breach in Council/Site procedures then recorded images may be used for reference/evidence purposes.

12.0 Access to data by third parties

- 12.1 Access to images by third parties will only be allowed in limited and prescribed circumstances.
- 12.2 Requests for information will be dealt with according to Section 29 & 35 of The Data Protection Act 1998
- 12.3 Applications must be in the form of a Subject Access Request – see Appendix C

13.0 Recorded Material Management

- 13.1 Images not required for the purpose(s) for which the equipment is being used will not be retained for no longer than is necessary. The detail as to how long data should be held will be defined within the service retention schedule. While images are retained access to and security of the images will be controlled in accordance with the requirements of the Data Protection Act.
- 13.2 Recorded material should be of high quality. In order for recorded material to be admissible in evidence the integrity and continuity must be maintained at all times.
- 13.3 Security measures will be taken to prevent unauthorised access to, alteration, disclosure, accidental loss or destruction of recorded material.
- 13.4 Recorded material will not be released to organisations outside the ownership of the system other than for training purposes or under the guidelines referred to previously.
- 13.5 Images retained for evidential purposes will be retained in a secure place where access is controlled – safe or locked cupboard in the management office.
- 13.6 The system records features such as the location of the camera and/or date and time reference.
- 13.7 In order to ensure that clear images are recorded at all times the equipment for making recordings will be maintained in good working order with regular servicing in accordance with the manufacturer's instructions.

14.0 Documentation

- 14.1 Log books must be sequential in order that pages or entries cannot be removed and full and accurate records kept.
- 14.2 The following administrative documents shall be maintained:
- occurrence/incident book
 - visitors register
 - maintenance of equipment, whether routine or breakdown
 - list of installed equipment

Appendix A – Camera detail and locations

Camera 1: Rear of bar, centre pointing right – Samsung Internal dome IR

Camera 2: Rear of bar, centre pointing left - Samsung Internal dome IR

Camera 3: Rear of bar, left pointing centre - Samsung Internal dome IR

Camera 4: Rear of bar, left pointing left – Samsung Internal dome IR

Camera 5: Skillicorne Gardens right, high – Samsung vandal resistant dome IR

Camera 6: Skillicorne Gardens right – Samsung vandal resistant dome IR

Camera 7: Skillicorne Gardens right – Samsung vandal resistant dome IR

Camera 8: Front of Garden Bar right to left – Samsung vandal resistant dome IR

Camera 9: CBC owned walkway between Town Hall and Quadrangle pointing towards public toilets - Samsung vandal resistant dome IR

The cameras detailed above monitor the main licensed areas, exits and bar producing images of sufficient quality to support any evidence for a prosecution or legal action.