**Carn Gwaval Wellbeing Centre CCTV Policy**

We believe that CCTV plays a legitimate role in helping to maintain a safe and secure environment for all our Council of the Isles of Scilly (CIOS) staff, service users and visitors to the Carn Gwaval Wellbeing Centre. Images recorded by CCTV are Personal Data and as such must be processed in accordance with data protection laws. The Council of the Isles of Scilly is the Data Controller of all CCTV Data captured at our Site. We are committed to complying with our legal obligations in order to appropriately handle and protect Personal Data and ensure that the legal rights of staff, service users and visitors to the Carn Gwaval Wellbeing Centre relating to their Personal Data, are recognised and respected. Please read this policy in conjunction with the Active Scilly Privacy Notice.

**About this policy**

This policy sets out why we use CCTV, how we will use CCTV and how we will process any CCTV Data recorded by CCTV to ensure that we are compliant with Data Protection Law.

This policy covers all CIOS staff, service users and visitors to the Carn Gwaval Wellbeing Centre.

**Why we use CCTV**

We currently use CCTV in the reception area, the gym and sports hall viewing area. We believe that such use is necessary for the following legitimate business purposes:

* to prevent or detect crime and protect buildings and assets from damage, disruption, theft, vandalism and other crime;
* for the personal safety of CIOS staff, service users and visitors to the Carn Gwaval Wellbeing Centre and other members of the public and to act as a deterrent against crime;
* for the health and safety of those using the gym;
* to support law enforcement bodies in the prevention, detection and prosecution of crime

**Monitoring**

The locations of the CCTV are chosen to minimise the viewing of spaces/individuals which are not relevant to the legitimate purpose of the monitoring as specified above. Currently, none of our CCTV records sound.

A live feed from the CCTV is monitored continuously **whilst the gym is open** and images are only revisited in the event of an incident or if a request is made.

Any staff using CCTV will be given training to ensure that they understand and observe the legal requirements relating to the processing of any Data gathered.

**How we operate CCTV**

Where CCTV is in use at our Site, we will ensure that signs are displayed at the entrance of the surveillance zone to alert CIOS staff, service users and visitors to the Carn Gwaval Wellbeing Centre that their image may be recorded. The signs will contain details of the organisation operating the system (where they are operated by a third party) and who to contact for further information.

We will ensure that live feeds from the CCTV are only viewed by appropriately authorised members of staff or third-party service providers whose role requires them to have access to such CCTV Data. Recorded images will only ever be viewed in a private space by an authorised member of the Active Scilly or Customer Services team.

**How we use the Data**

In order to ensure that the rights of individuals recorded by our CCTV are protected, we will ensure that CCTV Data gathered from such systems is stored in a way that maintains its integrity and security. This may include encrypting the Data, where it is possible to do so.

We will ensure that any CCTV Data is only used for the purposes specified above. We will not use CCTV Data for another purpose unless permitted by Data Protection Laws.

Where we engage Data Processors to process Data on our behalf, we will ensure contractual safeguards are in place to protect the security and integrity of the Data.

**Retention and erasure of Data**

Data recorded by our CCTV will be stored locally on servers at our site and on password protected servers by our third-party monitoring provider PSM Ltd. All recorded images will be automatically, permanently deleted after 30 days unless they are required for criminal or civil legal proceedings where the personal information is retained until after the legal case and any appeals have been concluded, which may be many years

**Ongoing review of our use of CCTV**

We will periodically review our ongoing use of existing CCTV at our Site to ensure that its use remains necessary and appropriate and in compliance with Data Protection Laws. We will also carry out checks to ensure that this policy is being followed by all staff.

**Service Providers**

In order to operate CCTV across our Site we appoint service providers to provide us with maintenance services related to that CCTV. Such service providers act only on our instructions and on our behalf for the purposes listed above. We require these service providers by contract to safeguard the privacy and security of Personal Data they process on our behalf.

**Requests of disclosure by third parties**

No images from our CCTV cameras will be disclosed to any third party (other than our third-party CCTV maintenance service providers Gylly Tech and PSM Ltd), without express permission being given by The Head of Service. Data will only be disclosed to a third party in accordance with Data Protection Laws.

In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

CCTV Camera locations

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| --- | --- | --- |
| Location | Intended Viewing Area | Reason for Camera |
| Reception | Main entrance to building, reception desk and door through to toilets, offices etc | Public task |
| Viewing area | Viewing area and entrance to sports hall | Public task |
| 6 x cameras in the gym | Gym | Contract |