

POLICY ON THE USE OF CCTV AT BROOKFIELD

This policy has been prepared in the light of the Surveillance Camera Commissioner's code of practice* and advice from the Brookfield managing agent (Mainstay Residential) about relevant legislation. It has been the subject of consultation with residents.

Purpose

The CCTV cameras on the front and back elevations of 25 to 56 Brookfield have been installed to deter burglary, to detect the method of entry if a burglary does occur and to provide evidence for investigation by the police and for any subsequent prosecution. The system is also intended to provide information about the cause of any damage to, or thefts of, or thefts from cars or other vehicles parked in the lane at the back of the building or in the turning circle at the end of the lane. For that purpose, one of the cameras on the back of the building has the capacity (APNR) to monitor number plates.

The system will not be subject to live monitoring. Images will only be accessed when necessary to provide information about an attempted or successful break-in or theft or when a complaint has been made about damage to a car or other vehicle.

Review

The operation of the system, its effectiveness and the purposes for which it has been used will be reviewed annually at the time of the BMFL AGM.

Privacy

The cameras on the front of the building have been set up so as to exclude any activity within the boundary of the cottage. The cameras on the back of the building include within their scope the back of Mulberry Cottage.

Signage

Signage is in place at the front and back of the building indicating that surveillance is taking place and providing a point of contact to raise any queries or complaints.

Responsibility

Responsibility for the system rests with the Board of Brookfield Mansions Freehold Limited (BMFL), advised by their managing agents (Mainstay Residential). BMFL directors and relevant Mainstay employees are made aware at the time of their appointment of their responsibilities under the relevant legislation, of the content of this policy and of the procedures they should follow. They will be reminded of their responsibilities at the time of each annual review.

The data controller is Mainstay Residential. They are responsible for providing advice on the way data protection applies to images collected on the system.

Retention of images

Images are retained on the system for 28 days. They are then automatically overwritten by new footage.

Access

For data protection reasons, initial access to the system is permitted only to directors of BMFL acting as volunteers, and only when there is a legitimate reason to view the footage, e.g. because a crime has been committed or is thought to have been committed or a complaint has been made about damage. There is no need to wait for police assistance to view footage. But the reasons for accessing the system must be documented.

If any other resident wishes to check whether there is any information on the system about damage to their vehicle, or thefts of it or from it, they should email the BMFL Board (directors@bmfl.org.uk). One of the directors will then view the footage and may use their discretion to involve others to help them. If the person or vehicle doing the damage is detectable, the director will approach the perpetrator and ask them to contact the complainant or give their permission for their identity to be disclosed to the complainant. If the perpetrator refuses to give permission, the Board director may provide the information to the police or, at the request of the complainant, to insurance companies.

The Directors may use their discretion to provide access to relevant images to residents other than themselves where it has not been possible for them to identify the person or vehicle doing damage to another resident's property or to resolve an incident in the way described above. BMFL will not accept responsibility for any matters that are not resolved.

A log is kept of all subject access requests, of every access to the system and of any breaches of the policy set out in this document. The log records the date and time of any access, the reason why access was required, the crime reference number if any, the nature and timing of any action was taken (e.g. whether anything was downloaded for export to the police or insurance company), the name and, if possible, the signature and badge number of the police officer who took possession of any data downloaded and the name and company of any representative of an insurance company to whom images are provided.

Copies of relevant images may be retained by the BMFL Board until an incident is resolved. They will then be destroyed.

The system is not accessible remotely.

Security

Stored images, and the screen to view them, are kept in a locked cupboard in the basement. Access to the cupboard is through a key kept in a box by the equipment. The box is accessed by a code known only to directors of BMFL. The system is also password protected, with the password known only to the same directors. The box code and system password will be changed twice a year at the time of the AGM and the budget meeting. They will also be changed when any director ceases their membership of the Board.

Evaluation

The system and this policy will be evaluated at the annual review to confirm that it remains necessary, proportionate and effective in meeting its stated purpose.

Export of the data

Images and information produced by the surveillance camera system will be made available to the criminal justice system in the event of any investigations by the police of actual or suspected crime. Data may also be provided to insurance companies on request in relation to a relevant claim.

Specialist technology

One camera in the back lane is capable of Automatic Number Plate recognition (ANPR). The system does not employ facial recognition technology.

Operation and maintenance

The system has been installed by Third Eye Security and will be subject to annual maintenance. Third Eye Security is NSI NACOSS Gold accredited. The system has been installed and is operated in accordance with current legislation.

BMFL Board

19 November 2019

*Surveillance Camera Commissioner Code of Practice June 2013 (updated 28 October 2014)
www.gov.uk/surveillance-camera-commissioner