

Procedure for the Use of Closed Circuit Television

Date: January 2020





Title	Procedure for the Use of Closed Circuit Television
Version	3
Owner	Head of ICU/ICT
Date Approved	January 2020
Approver	Data Protection Steering Group
Location	Intranet

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1. Purpose of this Procedure

This procedure supports the legislative framework for CCTV (Code of Practice, Information Commissioner's Office, 2014).

1.1 Libraries NI has installed CCTV systems to:

- Assist in the management of challenging behavior in respect of members of the public
- Provide reassurance for staff, in particular where single staffing is in place
- Assist in the management of safeguarding issues
- Assist with the investigation of incidents that may arise
- Assist in the routine management of access to and use of 'Out of Hours' enabled library facilities
- Provide evidence to assist in the investigation of incidents.

1.2 All staff must be aware of the purposes for which the procedure has been established.

1.3 All staff working in the library must be aware that they can only access and make use of CCTV equipment and images for the purposes listed in paragraph 1.1. Use for any other purpose could lead to disciplinary action.

2. Siting of Cameras/Monitors

As CCTV systems are capable of capturing images of all activities within the field of view it is essential that the location of the equipment is carefully considered. The standards to be met under this procedure are set out below:

2.1 Libraries will clearly display signs, as close as possible to the entrance point of buildings where CCTV monitoring takes place internally and/or as close as possible to the edge of each physical area being captured by CCTV systems where monitoring takes place externally, stating "CCTV IN OPERATION. CCTV images are being monitored and recorded for the purposes of crime prevention and public safety" so that the public and staff are aware that the building is covered by CCTV.

2.2 Cameras should be sited in such a way that the images captured comply with at least one of the purposes listed at paragraph 1.1.

2.3 Monitors displaying live images from CCTV equipment should be sited away from public areas or angled in such a way as to generally not be visible to customers.

3. Images

3.1 Quality: The quality and clarity of images is vitally important if CCTV is to achieve its intended purpose. To ensure quality and clarity the following standards will be adhered to:

- Staff will log a maintenance call immediately in the event of equipment breakdown, damage or deterioration in image quality;
- Staff will check regularly that the date and time stamp being recorded is accurate;
- A regular/annual maintenance regime will be in place.

3.2 Retention: Images will be retained for a period of time commensurate with the purposes for which they were recorded. Retention periods will range from seven to twenty-eight days depending on the equipment being used.

3.3 Disposal: Images stored on removable media such as DVDs will be erased or destroyed once the purpose of recording is no longer relevant. Recorded media and any digital copy must be destroyed securely following WEEE (Waste Electrical and Electronic Equipment Guidelines) disposal arrangements. Staff should contact their local Regional Admin. Centre to raise a requisition for this to be carried out.

4. Requests to View/Obtain a Copy of CCTV Images

Images recorded by CCTV equipment are personal data and are therefore subject to Data Protection Legislation 2018 and as such should be treated as a Subject Access Request following the Data Protection Procedure for Handling Requests for Personal Information.

The Legislation:

- Gives individuals, whose images are recorded on CCTV equipment, the right to view images of themselves and be provided with a copy ie subject access request; taking care that any other third party's personal data is not breached in any way. Please refer to the Data Protection Procedure for Handling Requests for Personal Data.
- Specifies certain circumstances when authorised third parties (Law Enforcement Agencies (LEAs) eg PSNI) can view/obtain a copy of CCTV images. Requests to view and/or obtain a copy of CCTV images will be dealt with in accordance with the procedure and flow chart below.

4.1 Viewing or copying CCTV images will be:

- Restricted and carefully controlled to protect privacy rights;
- Consistent with the purposes for which the system was installed (section 1).

4.2 As outlined in the Data Protection Procedure for Handling Requests for Personal Data the PSNI are permitted to view images to ascertain if they contain data relevant to their investigations. However PSNI requests to obtain a copy of images must be submitted on a PSNI Form 81¹. All other requests to view/obtain copies of images must be submitted in writing. Requests can be submitted by letter, fax, e-mail or by completing a Request to View or Obtain a Copy of CCTV Images form (Appendix 1).

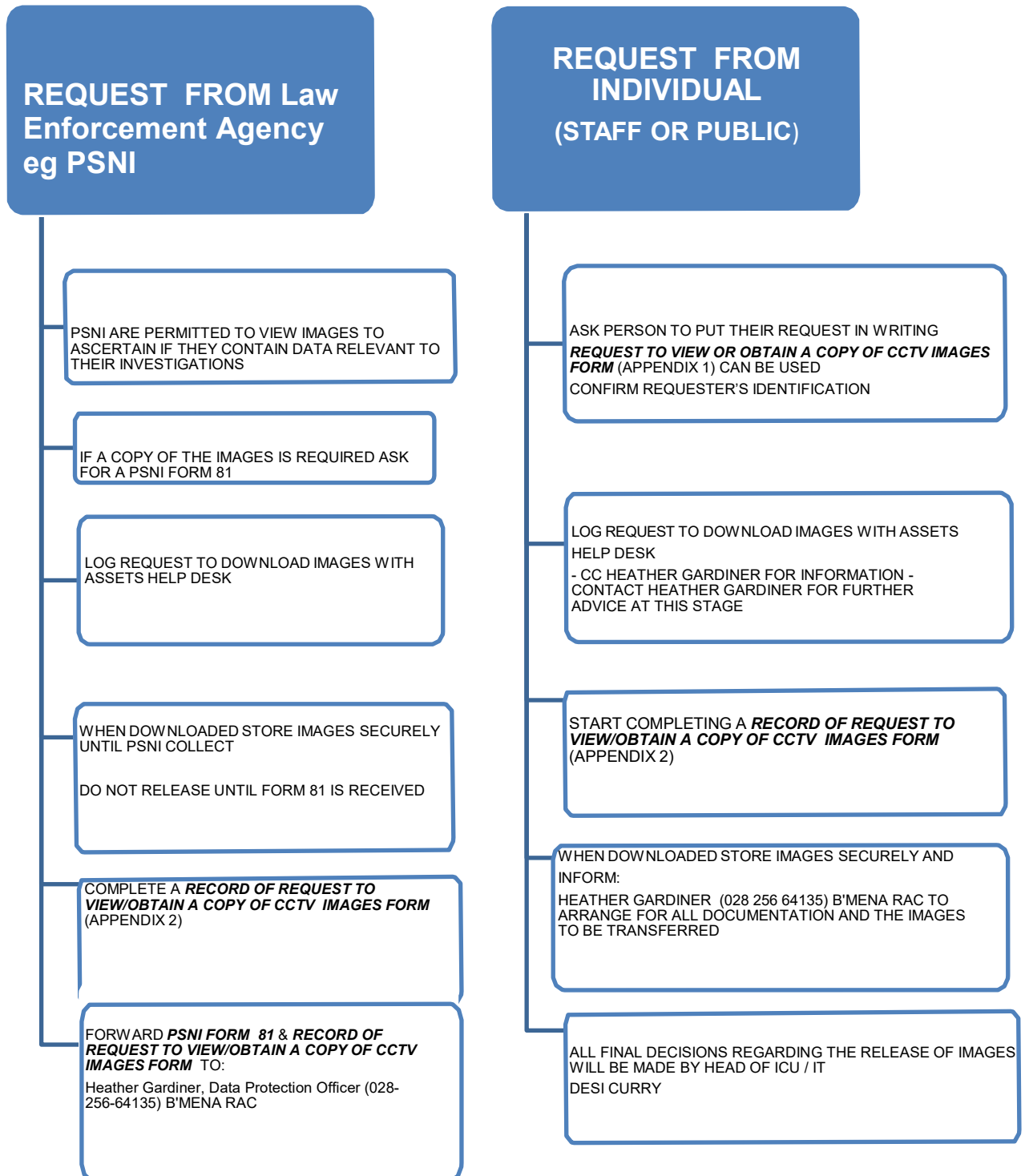
4.3 When a request is received in writing the Area Manager, Service Development Manager, Deputy Head of Service or other Head of Department should contact Assets immediately to arrange for the images to be identified and downloaded by a suitably qualified engineer.

¹ In certain circumstances the PSNI may remove the entire recording device for the purposes of crime detection. If this happens staff will contact Assets immediately.

- 4.4 The images should be viewed to determine if any other third party can be identified by the CCTV Footage. Contact the Data Protection Officer to discuss, as a third party's image would be classed as that third party's personal information, therefore giving this to another individual would be classed as a data breach.
- 4.5 The Area Manager, Service Development Manager, Deputy Head of Service or Head of Department will track action relating to requests to view/obtain CCTV images on the Record of Request to View/Obtain a Copy of CCTV Images form (Appendix 2).
- 4.6 Confirmation of the requester's identity will be required. For details see Record of Request to View/Obtain a Copy of CCTV Images form (Appendix 2).
- 4.7 Copies of images will be collected in person by the requester. Staff will confirm that the recipient is the requester to ensure that the images are released to the valid person.
- 4.8 Requesters of the information will not be charged a fee.
- 4.9 The record of requests to view/obtain a copy of CCTV images will be held centrally. Documentation (e.g. PSNI Form 81, completed appendix 1 and 2 etc.) will be retained by Heather Gardiner, Data Protection Officer, Ballymena Regional Admin. Centre (028 25 664135 / heather.gardiner@librariesni.org.uk)
- 4.10 Any other documentation from following the Data Protection Procedure for Handling Requests for Personal Data should be processed as outlined in that procedure.

5. How to Handle Requests to View/Obtain CCTV Images

This flow chart sets out the procedure for dealing with requests to view/obtain a copy of CCTV images.



6. Complaints

If the requester is dissatisfied with the response they receive regarding their request to view/obtain a copy of CCTV images they should submit a written complaint to Desi Curry (Head of ICU/ICT) who will undertake a re-assessment of the original decision in line with the complaints process set out in the Data Protection: Procedure for Handling Requests for Personal Data.

If the requester is unhappy with the outcome of their complaint they have the right to complain to the Information Commissioner (Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF, telephone: 03031231113, email: casework@ico.org.uk).

7. Monitoring

This procedure will be reviewed periodically for operational effectiveness and compliance.

APPENDIX 1

Request to View/Obtain a Copy of CCTV Images

1. Your contact details.

Name	
Address	
Telephone	

2. Please describe the images you require providing sufficient detail to assist us to locate them on the system.

3. Identification

Confirmation of your identity is required.

If you are a parent/guardian requesting to view images of your child, proof of your relationship to the child is required.

If you are requesting images on behalf of someone else a signed letter of authorisation from that person is required.

4. Declaration

	Tick
I confirm that the information I have supplied is correct and that I am the person to whom it relates.	
Requester's Signature:	Date:

To view Libraries NI's privacy statement please visit www.librariesni.org.uk

APPENDIX 2

Record of Request View/Obtain a Copy of CCTV Images

Part 1: This section to be completed when a PSNI Form 81 or written request from member of the public or staff is received.

Library: _____ **Date:** _____

Requester's identity confirmed

Parent/guardian relationship to child confirmed if images of child requested

Letter of authorisation provided if a 3rd. party is requesting images on behalf of someone else

Call logged with Assets Manager informed

When dealing with CCTV Images from a member of the public or staff the images should be viewed to ensure it does not contain any third party personal data (The Data Protection Officer should be consulted to help make this determination)

Part 2: This section to be completed when request has been dealt with.

Date images viewed and/or collected by PSNI or requester (delete as appropriate)	Date:
Identity of person viewing or collecting images confirmed	
Staff signature:	

OR

Date PSNI or requester informed that the images cannot be made available to them.	Date:
Reason for not making the images available:	
Staff signature:	

Part 3:

This form and all other documentation relating to this request will be stored by the Data Protection Officer. Please contact Heather Gardiner t: 028 25 664135, e: heather.gardiner@librariesni.org.uk to arrange transfer.