

# **CCTV Policy**

Bramley Village Hall Trust  
18 February 2026

## 1. Introduction

This CCTV Policy sets out how Bramley Village Hall manages and operates its CCTV system.

The system is used in accordance with:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018 (DPA 2018)**
- **Surveillance Camera Code of Practice (latest version effective 12 January 2022) [\[gov.uk\]](https://www.gov.uk)**
- **ICO CCTV Guidance [\[ico.org.uk\]](https://ico.org.uk)**

The BVH Trustees have appointed an external **Data Protection Officer (DPO)** to advise them with regards to the following:

- a. Monitoring & Compliance
- b. Data Protection Impact Assessments (DPIA)
- c. Ensuring Transparency & Lawful Use
- d. Supporting Data Subject Rights
- e. Management of Security & Access Controls
- f. Registration & Liaison with the Information Commissioner's Office (ICO)

## 2. Purpose of CCTV

CCTV is used to:

- Maintain security of the premises
- Deter, detect and prevent crime and antisocial behaviour
- Provide a safe environment for staff, volunteers, visitors and hirers
- Assist law enforcement agencies when necessary

## 3. Legal Basis

The use of CCTV constitutes processing of personal data under UK GDPR and DPA 2018.

Data will be:

- Processed lawfully, fairly and transparently
- Collected for explicit and legitimate purposes
- Limited to what is necessary
- Stored securely and only for as long as required

#### **4. Surveillance Camera Code of Practice Compliance**

The Hall will “have regard to” the **Surveillance Camera Code of Practice**, updated in 2021 and in force from 12 January 2022.

This includes following the Code’s **12 Guiding Principles**, such as:

- Use of surveillance must be necessary and proportionate
- Regular reviews of system effectiveness
- Transparency through signage and documentation  
[\[gov.uk\]](https://www.gov.uk)

#### **5. Siting and Operation of Cameras**

- Cameras will only cover areas relevant to the stated purposes
- Cameras will not be placed where individuals have a reasonable expectation of privacy
- Signage will be clearly displayed at all entrances

#### **6. Recording, Retention, and Storage**

- Images are recorded digitally
- Stored securely on a password-protected system
- Retention period: typically, **30 days**, unless required longer for an incident

#### **7. Access and Disclosure**

- Access limited to authorised Trustees acting as Data Controllers on behalf of the Trustees
- Disclosure only to law enforcement or in response to a valid Subject Access Request (SAR)

#### **8. Subject Access Requests (SARs)**

Individuals have the right to request footage of themselves.

Requests must include:

- Sufficient information to identify the person and relevant time period

Requests under SARs will be handled in accordance with UK GDPR requirements and should be made to the BVH DPO see contact details below.

## **9. Privacy Impact Assessments**

Before installing or repositioning any CCTV camera, a Privacy Impact Assessment will be conducted, following ICO expectations and advice from the BVH DPO.

## **10. Review**

This policy shall be reviewed every **two years** or sooner if legislation or guidance changes.

### **Contact details.**

BVH Trustee Data Controller: C Hayward, [bookings@bvht.org.uk](mailto:bookings@bvht.org.uk)

BVH Trustees Data Protection Officer (DPO): Matt Stevens,  
[matthew.stevens@stevensitsolutions.co.uk](mailto:matthew.stevens@stevensitsolutions.co.uk)

Date of Writing: September 2020

Date of Latest Review: February 2026

Date of Next Review: February 2027