

**Woodhall Estate**  
**CCTV Code of Practice**

# CCTV Code of Practice

## SECTION 1

### 1. Introduction and objectives of scheme

1.1 Woodhall Estate is fully committed to the safety of its staff, clients and visitors and to this extent has invested in the security of its buildings and grounds. The purpose of this Code of Practice is to regulate the management, operation and use of the closed circuit television (CCTV) system on The Estate.

1.2 The address for the Woodhall Estate Office is:

Estate Office  
Woodhall Park  
Watton-at-Stone  
Hertford  
Herts  
SG14 3NE

1.3 The purpose of this document is to state the intention, scope and purpose of the CCTV system, which operates in the area of Woodhall Park.

1.4 The CCTV system is based around digital technology and is treated as information that will be processed under Data Protection Act 1998.

1.5 The System comprises of 4 fixed cameras located externally around the Woodhall Park site. All cameras may be monitored and are only available for use by approved members of staff.

1.6 The CCTV system is primarily viewed and controlled at the Estate Office. Secondary monitoring facilities are available to staff who reside within the Park. Cameras are recorded digitally.

1.7 At times of heightened awareness, security staff may use body worn cameras for example during night time patrols and audio may be recorded to assist with the objective of the prevention and detection of crime and staff safety.

1.8 The objectives of the CCTV scheme are:

- For the purposes of the prevention and detection of crime
- To protect the main residence, Estate buildings and their assets to ensure they are kept free from intrusion, vandalism, damage or disruption
- To provide a safe environment for residents, visitors, staff and contractors and reduce the fear of physical abuse, intimidation and crime
- To assist the authorities with the investigation of crime
- To aid staff and contractor recognition
- To assist in identifying, apprehending and prosecuting offenders on the Estate site
- To protect members of the public and private property

## SECTION 2

### 2. General principles of operation

2.1 The CCTV scheme will be operated fairly in accordance with the requirements and the principles of the Human Rights Act 1998, the Data Protection Act 1998 and the Police and Criminal Evidence Act of 1984.

2.2 The CCTV system will seek to comply with the Information Commissioner's Code of Practice.

2.3 The scheme will only be used for the purpose for which it is established in accordance with this CCTV Code of Practice.

2.4 The operation of the CCTV scheme recognises the need for formal authorisation of any covert surveillance requested by the police as required by the Regulation of Investigatory Powers Act 2000.

2.5 The system will be operated with due regard to the principle that everyone has the right to respect for their private and family life. Suffice to say the scheme will be operated with respect to the privacy of the individual.

2.6 The public interest in the operation of the system will be recognised by ensuring the security and integrity of the data recorded and the operating procedures used to obtain such data.

2.7 The intention of this Code of Practice is, as far as is reasonably possible, to balance the objectives of the CCTV system with the need to safeguard the rights of the individual. Every effort has been made throughout this Code to show that a formal structure is in place, including a complaints procedure, so it can be shown that the system is accountable.

2.8 Participation in the CCTV system by any other party, organisation, individual or authority assumes an agreement by all such participants to comply fully with this code and to be accountable under the code of practice.

2.9 The copyright of the recorded data is owned by Woodhall Estate.

2.10. The CCTV system is owned by the Estate and will be subject to review annually.

## SECTION 3

### 3. Data Protection Legislation

3.1 The operation of the CCTV system has been notified to the office of the Information Commissioners Office in accordance with current data protection legislation.

3.2 The Data Controller is Woodhall Estate Management Limited and Woodhall Farming Company.

3.3 All CCTV data will be processed in accordance with the principles of the Data Protection Act 1998. The eight principles of the Act are addressed within this Code.

- All personal data will be obtained and processed fairly and lawfully
- Personal data will be held only for the purposes specified
- Personal data will only be used for the purpose and disclosed only to the people shown within this Code of Practice
- Personal data will only be held which is adequate, relevant and not excessive in relation to the purpose for which the data is held
- Ensure that personal data is accurate and where necessary, kept up to date
- Personal data will be held for no longer than is necessary
- Individuals will be allowed access to information held about them and where appropriate, will be permitted to correct or erase it
- Procedures will be implemented to put in place security measures to prevent unauthorised or accidental alteration, disclosure, loss or destruction of information

## SECTION 4

### 4. Public Concern

4.1 The majority of the public have become accustomed to being monitored by CCTV. However, concern is sometimes expressed as to how the information is processed and what happens to the material that is obtained. It is therefore acknowledged that the public have a right of privacy and the owners of the systems respect that right.

4.2 All personal data obtained by the CCTV system shall be processed fairly and lawfully and only be processed in order to achieve the stated objectives of the system. In processing personal data there will be respect for everyone's right to respect their private and family life.

4.3 Copies of this Code of Practice can be made available to the public by making a written request to the Estate Office at:

Estate Office  
Woodhall Park  
Watton-at-Stone  
Herts SG14 3NE

4.4 A copy of this Policy will be located at the Estate Office for information purposes to members of staff.

## SECTION 5

### 5. Procedure for the release of CCTV data

5.1 Subject to the following provisions, a member of the public or visitor to the Woodhall Estate can request information or data which has been recorded by the CCTV scheme. Permission must be obtained from a director. Under the terms of data protection legislation, a person has a right to access CCTV footage if they are the subject, providing that:

- The request is made in writing
- A specified fee is paid for each individual search
- The Estate must be supplied with sufficient information to identify the person making the request, a photograph may also assist in identifying the subject
- The person making the request must provide enough accurate information about the time, date and place so the information can be located
- The person making the request will only be shown information relevant to the particular search they have requested notwithstanding that 5.3 below applies

5.2 The person requesting CCTV footage must be able to confirm their identity and may provide the organisation with a photograph to assist with the search. Every effort will be made to comply with subject access procedures and each request will be treated on its own merit however, if insufficient or inaccurate information is provided, the Estate may refuse a request until sufficient information is provided.

5.3 The Estate, having verified the validity of the request, shall provide a copy of the requested material to the individual within 40 calendar days. Where possible, only the personal data which is specific to the individual and the search request will be provided.

5.4 If images of third parties are shown together with the images of the person who has made the data request, the organisation will consider whether the images of third parties need to be obscured. If these images would involve an unfair intrusion into the privacy of the third party, or cause unwarranted harm or distress, they will be obscured. In many cases, images will be disclosed as there is unlikely to be any such intrusion.

5.5 If there is no on-site means of editing out third party images, the material may be sent to an editing house for processing prior to the personal data being provided to the individual. The organisation reserves the right to pass on any costs incurred as a result of the “obscuring” process to the person requesting the data. Any such costs will be advised prior to the third party images being obscured.

5.6 If the individual (data subject) agrees, it may be possible to provide access to view the data. In such circumstances, the following should apply:

- Viewing should take place in a controlled environment.
- Material not relevant to the request should be masked or edited (see point 5.4) unless it is considered there is no unfair intrusion and the identity of others could not be known.
- Material should be available in a readily accessible format e.g. memory stick or DVD.

## **Exemptions to this provision**

5.7 In considering requests for information under section 7 of the Data Protection Act 1998, reference is also made to part 4 of the Act and in addition the following procedure is submitted:

Before personal recorded data is released the Estate must be satisfied that the data is:

- Not likely to be part of a current criminal investigation by the police
- Not likely to be part of a criminal proceeding
- The subject of a complaint or dispute that is unanswered
- The original data and that an audit trail is maintained throughout
- Not removed or copied without prior authority

5.8 The Woodhall Estate makes a specific prohibition on the disclosure of any recorded data for the purposes of commercial entertainment including posting on the internet.

## **Third party requests to view recorded data**

5.9 In accordance with the Police and Criminal Evidence Act and the Criminal Procedures and Investigations Act, a request to view CCTV data obtained from the system may be made by a third party. In such circumstances details of an individual not connected to the enquiry do not necessarily need to be withheld or blanked off.

Such third parties may include:

- The police
- Statutory authorities with powers to prosecute for instance HMRC
- Solicitors (a subpoena may be requested and in all circumstances the release of the data should be for a lawful purpose)
- Other agencies, according to purpose and legal status

5.10 The Woodhall Estate will not unduly obstruct a bona fide third party investigation to verify the existence of relevant data. Every effort will be made to comply with subject access procedures and each request will be treated on its own merit.

5.11 If a request is received for CCTV footage to be removed from the Estate by the Police, Local Authority or other law enforcement body or lawful applicant, a record will be maintained of the release of any data downloaded. A register will be available for this purpose and will be maintained by a Director. Evidence will be properly recorded, witnessed and packaged before copies are released to the police.

5.12 Viewing or downloads requested by the police or other authorised person must be recorded in writing and in the register. Such requests can only be actioned under section 29 of the Data Protection Act 1998, normally in relation to the prevention and detection of crime or the apprehension of an offender. In all circumstances, where identification has not been produced, it must be requested. Permission must be obtained from a Director.

5.13 Where CCTV footage is required as evidence, a copy may be released under the procedures described in the above paragraphs of this Code of Practice. Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the Estate Director.

5.14 In these circumstances downloads will normally be released where satisfactory documentary evidence is produced showing that it is required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £10.00 can be charged in such circumstances.



## SECTION 6

### 6. Accountability, Public Information and complaints

#### The public

6.1 Any complaints about the use of the Woodhall Estate's CCTV system can be made in writing to:

Estate Office  
Woodhall Park  
Watton-at-Stone  
Herts SG14 3NE

6.2 A copy of this Code of Practice can be obtained by making an application in writing to the Estate Office, address as above. The reasons for the request should be fully stated.

6.3 This document seeks to comply with the Information Commissioner's Office CCTV Code of Practice revised edition 2015.

6.4 Persons entering the Woodhall Estate will be warned they are entering an area where CCTV surveillance cameras are in use. Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at the principal access routes to areas covered by the Estate CCTV.

## SECTION 7

### 7. Control and Operation of Cameras

7.1 Control and operation of the CCTV cameras and associated management systems will be primarily undertaken by the Estate Office staff at Woodhall Estate in accordance with the principles and objectives expressed in this Code of Practice. The system will be administered and managed by the Property Manager using *IC2 CCTV & Security* contractors

7.2 The CCTV system will be operated 24 hours each day, every day of the year. The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency.

7.3 It is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage. Cameras are not installed where an individual has a heightened expectation of privacy.

7.4 All security personnel will be fully conversant with the contents and any amendments of the CCTV Code of Practice.

7.5 All employees who operate the CCTV system are subject to a strict discipline code and have been advised that if CCTV images are misused, a criminal offence could be committed. A duty of confidentiality applies both during and after their employment.

7.6 All members of the security department and any other person who is authorised to use the CCTV system by means of secondary control must adhere to the following:

- The operators of CCTV equipment and cameras will act with the utmost probity at all times and will not use the system inappropriately.
- The system will be operated with due regard to the principle that everyone has the right to respect to a private life, unless there is strong suspicion that a person is acting in a manner which is detrimental, criminal or inappropriate to the Woodhall Estate. The system will be operated with due regard to this principle.
- The use of the cameras will accord with the purposes and key objectives of the scheme and shall be in compliance with this Code of Practice.
- Cameras will not be used to look into private homes, gardens and other areas of private property. Privacy zones may be programmed into the camera.
- Any person who operates a camera will be mindful of exercising prejudices, which may lead to complaints of the scheme being used for purposes other than those for which it is intended.
- Private and confidential information relating to the organisation, its visitors or residents must not be directly or indirectly divulged to a third party without proper authorisation.
- The operators may be required to justify their interest in, or recording of any particular individual, group of individuals at any time by virtue of the audit process of the scheme.
- Technical information including the design and development of the CCTV system must not be divulged to any person outside of the security department.
- Cameras will be used to monitor activities within the Estate buildings, car parks, access and egress points and other areas to identify criminal activity actually occurring, anticipated, or perceived, and

for the purpose of securing the safety and wellbeing of the occupants within the Estate, together with its visitors.

- Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without authorisation.

7.7 Any employee who fails to adhere to the above points without proper authorisation will be liable to serious disciplinary action which may include dismissal and/or prosecution.

### **Primary control**

7.8 Staff or contractors with direct responsibility for using, overseeing and controlling the CCTV equipment will have access to the operating controls at the Estate Office.

### **Secondary Control**

7.9 Secondary Control of the CCTV system will only be provided to employees (other than CCTV contractors during the course of their work) who are directly employed by the Woodhall Estate and authorised by the Estate Director.

### **Contractors**

7.10 The CCTV equipment is maintained by a reputable company. Their operatives are fully aware of their Data Protection responsibilities.

## **SECTION 8**

### **8. Liaison**

8.1 Liaison meetings may be held with all bodies involved in the support of the CCTV scheme i.e. CCTV maintenance contractors, approved staff, police, other branches of law enforcement or local authority.

## SECTION 9

### 9. Number and location of cameras

9.1 The CCTV system installed within the Woodhall Estate comprises 10 colour cameras; the number of cameras may alter subject to changes within the Estate and amenities. Some of these cameras will have zoom pan and tilt facilities, the remainder will be fixed lens. The majority of cameras are IP addressable. The cameras are recorded digitally with varying frame rates and footage will be retained for a minimum of 31 days.

9.2 Video analytics are deployed which enable real-time information alerts and advanced event-based searches of archived video data.

9.3 Where appropriate, cameras that are installed externally may have “privacy zones” programmed if this is necessary to protect the privacy of any person residing within camera range. Where this cannot be achieved, camera operators will be specifically trained and are instructed via this Code of Practice regarding privacy issues.

9.4 In some locations, full zoom pan and tilt covert colour cameras are installed in domes for general surveillance/security purposes, these cameras are recorded digitally.

9.5 Cameras are colour but may switch to monochrome in low light levels.

9.6 As a general policy, cameras will not be installed in areas where a visitor or employees have a heightened expectation of privacy.

## SECTION 10

### 10. Body worn video and audio

10.1 Body worn video and audio (BWV) involves the use cameras that are worn usually by a person deployed on security duties. BWV devices are usually attached to clothing, uniform or may form part of the identification badge. These devices can often record both visual and audio information.

10.2 Although the Woodhall Estate has not used such equipment, it is possible that at times of heightened awareness or on advice of police, the use of BWV supports the prevention and detection of crime objective. This could be a proportionate and necessary response particularly during night time patrols where audio may also be recorded to assist with the safety of staff.

10.3 Personal data processed on body worn video cameras is likely to be sensitive and is therefore likely to cause damage or distress if it was lost or stolen. Only authorised personnel will extract and view the data from the device.

## **SECTION 11**

### **11. Data Retention**

11.1 CCTV data will be held for no longer than is necessary, unless there is an evidential or operational reason to retain CCTV footage longer, the data retention periods for the CCTV system at the Woodhall Estate comply with the Home Office guidelines.

11.2 Due to the nature of digital recording, retention periods may not be exact and data may be held longer.

## SECTION 12

### 12. Handling, downloading and release of recorded materials

12.1 CCTV data must be treated as confidential information. The privacy of our visitors, customers, employees, residents and any other person who may be affected by the scheme is paramount and must be respected.

12.2 Facilities exist to download CCTV data from the digital system in a media format that can easily be viewed. Data can only be downloaded in pursuance of the objectives of this code of practice and in compliance with the Data Protection Act.

12.3 Any employee found downloading CCTV footage which does not comply with this code or without proper authority will be liable to disciplinary action which may lead to dismissal.

12.4 An audit trail can be established to ascertain accountability through the CCTV systems software. The management and audit responsibility for the system falls to the Estate Director.

12.5 The procedure for the release of recorded material to third parties and upon the receipt of a legitimate request is detailed in section 5.

In addition requests for recorded data may be made by:

- A senior member of the management team
- Legal representatives of the Woodhall Estate

### Video prints

12.6 All data obtained from the CCTV system is confidential and can only be used in compliance with the objectives of this scheme. This includes video prints of still images obtained from the CCTV footage.

12.7 The guiding principles are that video prints cannot be taken as a matter of routine. Each time a print is made it must be capable of justification by the originator who will be responsible for recording the full circumstances under which the print is taken.

12.8 Video prints and CCTV images will only be released to the media by the police in an effort to identify alleged offenders.



## **SECTION 13**

### **13. System Maintenance & Monitoring**

13.1 The system will be maintained in accordance with the Data Protection Act 1998.

13.2 The system will only be maintained and monitored by companies which carry the relevant accreditation.

13.3 It will be the responsibility of the Property Manager to liaise with the maintaining company for the reporting of faults on the system, any changes to the site which may affect the operation of the system.

13.4 It will be the responsibility of the Property Manager to arrange regular system reviews with the maintaining company.

13.5 The system will be maintained on a regular basis by an approved contractor.

## **SECTION 14**

### **14. Accountability and breaches of policy or security**

14.1 Any breach of this Code of Practice by any employee will be initially investigated by the Estate Director and, where appropriate, disciplinary action may be taken.

14.2 Any serious breach of this Code of Practice may be the subject of an independent investigation with recommendations made accordingly to remedy the breach.

14.3 It is not the primary purpose of the scheme to monitor staff performance, other than in the interests of the prevention and detection of crime. However, where a member of staff is found to have not met the required standards, CCTV footage may be used for staff improvement or disciplinary purposes.

## SECTION 15

### 15. Summary of Key Points

15.1 The Woodhall Estate CCTV Code of Practice and on-going requirement for CCTV will be reviewed on an annual basis.

- The CCTV system is owned and operated by Woodhall Estate Management Limited and Woodhall Farming Company.
- The CCTV system cannot be accessed by visitors/members of the public except under the prescribed procedure specified in this Code of Practice and by prior arrangement with the Estate Director.
- CCTV footage/data can only be downloaded in accordance with the procedures detailed in the Code of Practice and may only be viewed by authorised staff, the police or other agencies as specified
- CCTV footage required as evidence will be properly recorded, witnessed and packaged before being released to the police
- CCTV footage will not be made available to the media for commercial or entertainment reasons
- Covert Surveillance will only be undertaken in accordance with the objectives this CCTV scheme and in accordance with prevailing legislation
- Any breaches of this Code of Practice will be investigated by the Estate Director. An independent investigation will be conducted for serious breaches.