**The Ditchley Estate**

**CCTV policy**

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# Ownership

The Ditchley Estate (“Ditchley”) is owned by The H D H Wills 1965 Charitable Trust ("the Trust").

Ditchley operates a CCTV surveillance system (“the system”) at Charlbury Lodge and Ellen’s Lodge gates, with images being monitored and recorded centrally. The system is owned and managed by Ditchley and operated by Estate employees and Adkin who are the managing agents. The responsible manager is Sarah Payne at Adkin (land agent for the Trust).

The CCTV system at the Kiddington Lodge Gate is operated by the Ditchley Foundation. Enquiries in relation to this system should be directed to the Ditchley Foundation [insert contact details if appropriate].

# Compliance

Images obtained from the system which may include recognisable individuals constitute personal data and are covered by the Data Protection Act 2018 and the General Data Protection Regulation. This Policy should be read in conjunction with the Trust’s Privacy Notice which can be found at <https://hdhwills.org/privacy-policy/>.

This policy has been drawn up in accordance with the advisory guidance contained within the Information Commissioner’s CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.

# Purpose

We currently use CCTV as outlined below. We believe that such use is necessary for our legitimate business purposes, including:

* crime prevention and the detection and prosecution of crime;
* for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
* to support law enforcement bodies in the prevention, detection and prosecution of crime;
* to assist in day-to-day management, including ensuring the health and safety of staff and others;
* to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
* to assist in the defence of any civil litigation, including employment tribunal proceedings.

This list is not exhaustive and other purposes may be or become relevant. The operators of the system recognise the effect of such systems on the individual and the right to privacy.

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# Description

The system is intended to produce images as clear as possible and appropriate for the purposes stated. The system does not record audio. The system is operated to provide when required, information and images of evidential value.

Cameras are located at Charlbury Lodge and Ellen’s Lodge Gates.

Signage is prominently placed at strategic points to inform staff, visitors and members of the public that a CCTV installation is in use and includes contact details for further information.

# Operation

Images captured by the system are recorded continuously and may be monitored remotely. Images displayed on monitors are not visible to the public and access is restricted to authorised members of staff.

All staff monitoring CCTV images are made aware of the sensitivity of handling these images and recordings. Authorised staff are fully briefed and trained in all aspects of the operational and administrative functions of the system.

# Information retention

No more images and information shall be stored than is required for the stated purpose. Images will be permanently and securely deleted once their purpose has been discharged.

# Access

Access to images is restricted to those who need to have access in accordance with this policy (which may include the police and other law enforcement bodies), the management procedures in place and any governing legislation.

Disclosure of recorded material will only be made to third parties in accordance with the purposes of the system and in compliance with Data Protection Legislation. We reserve the right to obscure images of third parties where we consider it necessary to do so.

Anyone who believes that they have been filmed by the system can request a copy of the recording, subject to any restrictions covered by Data Protection Legislation. Individuals' rights are detailed in our privacy policy. Procedures are in place to ensure all such access requests are dealt with

effectively and within the law. Requests should be addressed to sarah.payne@adkin.co.uk or by letter to:

Mrs Sarah A Payne

Adkin

Orpwood House

School Road

Ardington

Wantage

Oxon

OX12 8PQ

# Covert recording

Covert cameras may be used only in limited circumstances; for example, where there have been specific incidents of trespass or criminal activity. Covert recording requires the written authorisation of Sarah Payne.

Covert surveillance may be carried out in cases of suspected specific criminal activity only where the objective of making the recording would be seriously prejudiced should the individual(s) concerned be informed of such surveillance.

Any authorisation to use covert surveillance must include a justification of the need to use such methods to obtain evidence of suspected criminal activity in a specific case; an assessment of alternative methods of obtaining such evidence and a statement of how long the covert monitoring should take place. The authorisation will be reviewed every 7 days. Any decision to use covert surveillance for any reason must be documented and records of such decision retained securely.

Images obtained through covert recording will be deleted within 7 days of recording unless the recordings are to be retained for the prevention/detection of unlawful acts.

# Feedback

Members of the public should address any concerns or complaints over use of the Ditchley’s CCTV system by email: sarah.payne@adkin.co.uk, or by telephone: 01235 862888. Ditchley staff should address any enquiries or concerns relating to the system to Sarah Payne in the first instance.

# Annual review

This policy was updated on 26th November 2018. It will be reviewed annually by the Trust's Trustees to ensure that the purposes still apply.

This Policy document rests with [Sarah Payne].