

Deans Court | CCTV Policy

Date to be revised: December 2025

This policy is drafted in accordance with the requirements of the General Data Protection Regulation ("GDPR").

Policy Statement

Deans Court uses Close Circuit Television ("CCTV") within and around the premises of the Deans Court's café, homestore, car park, marquee and main house (collectively: "premises"). The purpose of this policy is to set out the position of Deans Court as to the management, operation and use of the CCTV at the various premises.

This policy applies to all members of our teams, visitors to Deans Court premises, and all other persons whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- The General Data Protection Regulation ("GDPR")
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

Data Protection Officer

Deans Court is not a public authority, nor does its core activities require regular and systematic monitoring of individuals on a large scale or involve processing on a large scale 'special categories' of personal data, or 'criminal convictions or offences data'. As such, Deans Court is not required to nominate a Data Protection Officer.

Registration as a Data Controller

Deans Court has registered (in primary connection with its principle system: Deans Court Café) as a Data Controller and pays its annual "Data Protection Fee" via direct debit. Registered with the ICO, reference: ZA455967.

Purpose of CCTV

Deans Court uses CCTV for the following purposes:

- To provide a safe and secure environment for residents, staff, visitors and guests
- To prevent the damage to or loss of buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

Description of System

Deans Court uses fixed cameras, with 'night vision' via IR. There are three DVRs (located in the café, marquee, and main house) with up to eight cameras attached to each system. Occasionally a 'mobile' camera is also used at remote gates.

Siting of Cameras

All CCTV cameras are sited in such a way as to meet the purpose for which the CCTV is operated. Cameras are sited in prominent positions where they are clearly visible to staff and visitors. Covert cameras are not in use.

Cameras are not sited in such a way as to record areas that are not intended to be the subject of surveillance.

Discrete signs are erected to inform individuals that they are in an area within which CCTV is in operation.

Cameras are not sited in areas where individual have a heightened expectation of privacy, such as toilets.

Privacy Impact Assessment

Deans Court has adopted a 'privacy by design' approach, considering the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

Management and Access

The CCTV system will be managed by Deans Court.

The viewing of live CCTV images from the marquee DVR will usually be restricted to a small, multi-feed screen located on the control desk of the marquee (staff side). This serves the dual purpose of both preventing the damage to or loss of assets and to assist in the prevention of crime (as above).

The viewing of live CCTV images from all DVRs will be restricted to senior staff via passcode protected 'apps' on devices.

The privacy impact of the viewing of live images as described above has been determined to be negligible.

The viewing of recorded images which are stored by the CCTV system will be restricted to senior staff, or members of staff with a valid need to view images, for the reasons set out.

No other individual will have the right to view or access any recorded CCTV images unless in accordance with the terms of this policy as to disclosure of images.

The CCTV system is checked periodically to ensure that it is operating effectively.

Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded. Recorded images are stored only for a period of two weeks unless there is a specific purpose for which they are retained for a longer period.

Deans Court will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to senior members of staff;
- CCTV recording systems being located in restricted access areas (applies to main house DVR only)

Disclosure of Images to Data Subjects

Any individual recorded in any CCTV image is a data subject for the purposes of the GDPR, and has a right to request access to those images.

Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the legislation.

Such a request should be considered in the context of Deans Court's 'Subject Access Request Policy'. When such a request is made, a member of the senior team will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request. If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The senior team member must take appropriate measures to ensure that the footage is restricted in this way.

If the footage contains images of other individuals then the senior team member must consider whether:

- The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
- The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
- If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The process followed by the senior team member in determining whether the images contained third parties;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

Disclosure of Images to Third Parties

Deans Court will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

If a request is received from a law enforcement agency for disclosure of CCTV images a senior team member must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

The information above must be recorded in relation to any disclosure.

If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires.

If there are any concerns as to disclosure of CCTV images to any third party, then appropriate legal advice may be required.

Misuse of CCTV Systems

The misuse of CCTV system could constitute a criminal offence.

Any member of staff who breaches this policy may be subject to disciplinary action.

Review of Policy and CCTV System

The CCTV system and this policy relating to it will be reviewed every two years.

Complaints Relating to this Policy

Any complaints relating to this policy or to the CCTV system operated by Deans Court should be made to: info@deanscourt.org / 01202 849314 / Deans Court, 2 Deans Court Lane, Wimborne, Dorset, BH21 1EE