



Northern
Lighthouse
Board

CCTV POLICY

Sponsor: Data Protection Officer
Approver: Director of Business Services

1. Policy Statement

The Northern Lighthouse Board (NLB) is committed to a policy of protecting the rights and privacy of individuals (staff and others) in accordance with the General Data Protection Regulations (GDPR) and Data Protection Act 2018.

The Board has installed and uses CCTV (closed circuit television) and video entry systems at various locations within its estate. The monitoring, recording, holding and processing of images of identifiable individuals captured by the CCTV system constitutes personal information as defined by the GDPR and the Board will therefore operate the CCTV system to meet the requirements of the legislation and [Revised - CCTV Code of Practice](#) published by the Office of the Information Commissioner (ICO).

Legitimate concerns exist over the use of CCTV and it is therefore necessary to ensure that there is adequate control and supervision of the system, together with scrutiny of its operation. This document provides the policy framework through which this can be achieved. NLB have developed a [Privacy Notice for issue to Visitors](#) to explain the purpose and basis for CCTV recordings.

2. Scope

This policy applies to all employees of Northern Lighthouse Board, individuals providing a service to the Board, visitors and all other persons whose image(s) may be captured by the system.

Any breach of Data Protection Legislation will be taken seriously and may result in action being taken under the NLB disciplinary policy.

3. Legal Basis and purpose

The legal basis for processing CCTV footage is that it is in our 'Legitimate Interests' to ensure the safety of our people, our visitors, our buildings and their environs.

We aim to operate the CCTV system in a manner that is consistent with respect for the privacy of the individual. The objectives for making and storing CCTV recordings are limited to:

- Protecting NLB property and assets;

- Providing a deterrent to potential offenders;
- Facilitating the investigation, prevention and detection of crime;
- Enhancing the health, safety and welfare of staff and visitors;
- Aiding compliance with the International Ship & Port Security Code;

The use of CCTV will not infringe an individual's right to privacy or monitor staff and visitor activities except in the above stated situations.

4. Responsibilities

The CCTV installation is entirely owned by the Northern Lighthouse Board. The Director of Business Services has strategic managerial responsibility with the following members of staff having day-to-day operational management responsibility within their area:

Area	Operational Manager	In their absence
Headquarters	Facilities Officer	1. Information Security Manager 2. Technical Systems Manager 3. Technical Systems Officer
NLB Oban	Marine Operations Manager	1. Technical Systems Officer 2. Admin & Stores Co-ordinator
NLV Pharos	Master	Chief Officer
NLV Pole Star	Master	Chief Officer

The relevant Operational Manager is responsible for ensuring that:

- The CCTV is operated in accordance with this policy;
- The purposes and objectives of the scheme are not exceeded;
- Regular evaluation and assessment of the usage and efficiency of the system is carried out;

The Compliance Officer will provide advice and guidance relating to data protection where necessary.

5. Cameras and signage

The Northern Lighthouse Board will ensure that staff, visitors and the public are made aware of the presence of CCTV and its ownership by appropriate signage and by directing visitors to the on-line [Privacy Notice for to Visitors](#). Signs are to be placed so that the public and staff are aware that they are entering a zone which is covered by surveillance equipment and should be clearly visible and legible.

CCTV cameras are to be situated to ensure that they capture images relevant to the specific purpose of the scheme. For example, if the purpose of the scheme is the prevention and detection of crime, the cameras are to be sited such that images enabling identification of perpetrators are captured. However, care is to be taken to ensure that the cameras cover only the environs of the NLB site and not be unnecessarily intrusive.

6. Webcams in public places

The need to warn people that they might be on camera does not arise if individuals are not identifiable from the webcam output. But where individuals are likely to be identifiable, for example where a webcam transmits a sufficiently high level of detail, appropriate signage should be in place to warn people.

7. Operation of the system

Access to monitors for the purpose of operation and viewing of images is restricted to staff that need to have access to achieve the purpose of the scheme.

Live viewing of the images is possible by the following individuals:

Location	Accessible to	Which cameras	Why?
Headquarters	Facilities Officer	All Cameras	Key responsibilities for building security.
	Reception staff	All Cameras	Safety and security - To identify who is at the door before answering. To facilitate locating staff.
	Stores Officer	All Cameras	Safety and security - To identify who is at the door before answering.
	ICT Team	All cameras covering HQ and the server room in Oban.	Responsible for checking and maintaining CCTV equipment. Monitors are on view so that remedial action can be taken if a camera goes out of action.
Oban Base	Reception staff	All cameras covering Oban Base	Safety and security - To identify who is at the door before answering.
	Marine Operations Manager	All cameras covering Oban Base	Key responsibilities for building security. Responsible for ensuring compliance with the International Ship & Port Security Code.
	ICT Team	All cameras covering Oban Base	Responsible for checking and maintaining CCTV equipment.
NLV Pole Star	Master	All cameras covering the ship	Key responsibilities for ship safety and security.
	Chief Officer	All cameras covering the ship	Key responsibilities for ship safety and security.
NLV Pharos	Master	All cameras covering the ship	Key responsibilities for ship safety and security.
	Chief Officer	All cameras covering the ship	Key responsibilities for ship safety and security.

The ability to copy images from the CCTV system is also restricted to staff that need to have that access in order to achieve the purposes of the scheme or to meet legislative requirements i.e. to fulfil a Subject Access Request. Copying CCTV images is restricted to the following individuals:

Location	Primary Responsibility	Secondary Responsibility
Headquarters	Information Systems Manager	Facilities Officer
Oban Base	Waterfront Support Manager	Technical Systems Officer Admin & Stores Officer
NLV Pole Star	Master	Chief Officer
NLV Pharos	Master	Chief Officer

The process for accessing CCTV images can be found in Appendix 1.

8. Processing and storing CCTV images

Images are required to be retained for no longer than is necessary for the purposes stated above, under normal circumstances this will be a maximum for 31 days, However where images are deemed worthy of archiving in the public interest, the files may be processed to secure the permanent availability of recorded memory.

CCTV images will be kept by each area as detailed in the table below, after which they will automatically be overwritten.

Imagery required for investigative or evidential purposes may be retained beyond 30 days and is securely disposed of upon completion/conclusion of the purpose for which it has been retained. While images are retained, it is essential that their integrity and security is maintained. Such images are to be kept in a secure place to which access is controlled.

Location	Medium	Storage	Retention period
Headquarters	Digital	Systems hard drive	31 days
Oban	Digital	Systems hard drive	31 days
Pharos	Digital	Systems hard drive	8 days
Pole Star	Video	Video	8 days

9. Viewing Recorded Images

Viewing of recorded images is permitted only in a restricted area, for example, in a designated member of staff's office. Non-involved persons are not be allowed access to the area when a viewing is taking place.

Requests to view recorded images are to be made by completing the form "Request to View or Copy CCTV", associated with this policy.

10. Data Subjects Access Rights

Individuals whose images are recorded on CCTV have a right under the both the GDPR and the Data Protection Act 2018 to view the images of themselves and, unless they agree otherwise, to be provided with a copy of the images. This is called a Subject Access Request.

Any individual who wishes to exercise this right should complete the form associated with this policy "Request to View or Copy CCTV" and submit it to the person with Primary Responsibility for the CCTV cameras covering the area they wish to view. Alternatively, they can apply in writing (this includes email) and must:

- Provide 2 pieces of approved photographic identification i.e. driving licence and passport;
- Include sufficient details to enable the information to be located i.e. date, reasonable time window and location details.

NLB will provide the images only when satisfied that the requestor is subject of the images requested.

11. Responding to Subject Access Requests

Subject Access Requests will be complied with within the statutory 20-day period. Where an individual requests to view their recorded information they will need to make an appointment.

12. Subject Access Requests - Images of third parties

If images of third parties are also shown with the images of the person who has made the request, the images of third parties should be obscured.

The following are examples from the Information Revised Commissioner's Code of Practice regarding releasing images of third parties:

Example 1: A public space CCTV camera records people walking down the street and going about their ordinary business. Where nothing untoward has occurred, this can be released without editing out third party images.

Example 2: Images show the individual who has made the request with a group of friends, waving at the camera in the town centre. There is little expectation of privacy and the person making the request already knows their friends were there. It is likely to be fair to release the image to the requester without editing out the faces of their friends.

Example 3: Images showing a waiting room in a doctor's surgery. Individuals have a high expectation of privacy and confidentiality. Images of third parties should be redacted (blurred or removed) before release.

When releasing images, it is important to record your reasoning for full release or edited versions on the request form. Consult the Data Protection Officer for advice if necessary.

13. Disclosure of images to third parties

There will normally be no disclosure of recorded images to third parties other than the Police or other law enforcement. Where disclosure is made, it will be because the images would assist in a specific criminal enquiry, or to identify a victim, witness or perpetrator in relation to a criminal incident.

Disclosure of recorded images to third parties should only be made in limited circumstances where it may be appropriate to release images where their needs outweigh those of the individuals whose images are recorded. Consult the Data Protection Officer for advice where necessary.

Once disclosed images become the responsibility of the Data Controller for their copy of those images and it is their responsibility to comply with the Data Protection Act regarding any further disclosures.

14. Maintenance of CCTV equipment

CCTV equipment will be serviced and maintained as recommended by the supplier.

15. Copyright

Copyright of images recorded on the CCTV systems operated on the Board's sites is owned by the Northern Lighthouse Board.

16. Complaints

The Compliance Officer will co-ordinate any complaints received in respect of CCTV and these will be handled in line with NLB's Complaint Procedure, OP12. Complaints are to be addressed to:

Compliance Officer
Northern Lighthouse Board
84 George Street
Edinburgh
EH2 3DA

or

Email: enquiries@nlb.org.uk

17. Review

This policy will be reviewed annually.

Appendix 1 - Accessing CCTV Images

CCTV is accessible to authorised staff as detailed in Paragraph 4 and only for the purposes set out in this policy.

The procedure for viewing and copying CCTV footage is as follows:

