



S A N D R I N G H A M

CCTV Policy

1. Introduction

Sandringham 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 Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system on The Estate.

Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under Data Protection Act 1998. The person ultimately responsible for data protection within The Estate is the Land Agent.

The System comprises a number of fixed, dome and mobile cameras located both internally and externally around the Estate site. All cameras may be monitored and are only available for use by approved members of staff.

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

2. Objectives of the CCTV System

The objectives of the CCTV system are:

1. To protect The Estate buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
2. To increase the personal safety of staff and client and reduce the fear of physical abuse, intimidation and crime.
3. To support the police in a bid to deter and detect crime.
4. To assist in identifying, apprehending and prosecuting offenders on The Estate site.
5. To protect members of the public and private property.
6. To assist in the usage and management of The Estate building on a day to day basis.

3. Statement of Intent

1. The CCTV system will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act 1998 and the Commissioner's Code of Practice.
2. The Estate will comply with the Data Protection Act 1998, whether it be information, recordings and downloads which relate to the CCTV system.
3. Cameras will be used to monitor activities within The Estate buildings, the 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 well-being of the occupants within The Estate, together with its visitors.
4. Staff have been instructed to ensure that static cameras will not focus on private homes, gardens and other areas of private property (with the exception of The Pavilion).
5. 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 by the Land Agent being obtained.
6. Materials or knowledge secured as a result of CCTV system will not be used for any commercial purpose. Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment.
7. The planning and design of the existing CCTV system has endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.
8. 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.

4. Operation of the System

The system will be administered and managed by the Land Agent and the Security Team at Sandringham Estate, in accordance with the principles and objectives expressed in this Policy.

1. The day-to-day management will be the responsibility of the Head of Security at Sandringham Estate.
2. The CCTV system will be operated 24 hours each day, every day of the year.

5. CCTV System

1. The Head of Security or a member of the Security Team will check and confirm the efficiency of the system on a daily basis and in particular that the equipment is properly recording and that cameras are functional.
2. Access to the CCTV will be strictly limited to the members of staff approved by the Land Agent.
3. Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.
4. The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Land Agent. If permission is granted by the Land Agent, the member of the public must be accompanied throughout the visit by a member of staff.
5. Any site visit by a member of the public may be immediately curtailed if the operational requirements of the CCTV System make this a necessity.
6. Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs by the ICT Manager.
7. In the event of an emergency which requires an immediate contact with an emergency service to be contacted by a member of staff. The emergency procedures identified in the Health & Safety Policy will be adhered to.

6. Liaison

1. Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e. maintenance contractors, approved staff, police etc.

7. Monitoring Procedures

1. Camera surveillance may be maintained at all times for monitoring purposes.

8. Video Download Procedures

1. Recordings may be viewed by the police and authorised officers from the Head of Security or the ICT Manager, for the prevention and detection of crime. Permission to do this will be given from the Land Agent.
2. A record will be maintained of the release of downloads to the police or other authorised applicants. A register will be available for this purpose and will be kept by the Head of Security or the ICT Manager.
3. Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police can only be actioned under section 29 of the Data Protection Act 1998.
4. Should download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will only be released to the police on the clear understanding that the disc remains the property of The Estate, and both the disc and information contained on it are to be treated in accordance with this Policy. The Estate also retains the right to refuse permission for the police to pass to any other person the disc or any part of the information contained thereon.
5. Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the Land Agent. In these circumstances downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £100.00 can be charged in such circumstances.

9. Breaches of the Policy (including breaches of security)

1. Any breach of this Policy by Estate staff will be initially investigated by the Land Agent in order for him to take the appropriate disciplinary action.
2. Any serious breach of the Policy will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

10. Assessment of the Scheme and CCTV usage Policy

Performance monitoring, including random operating checks, may be carried out by the approved persons.

11. Complaints

1. Any complaints about The Estate's CCTV system should be addressed to the Land Agent.
2. Complaints will be investigated in accordance with Section 9 of this Policy.

12. Access by the Data Subjects

1. The Data Protection Act provides Data Subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV.
2. Requests for Data Subject Access should be made in writing to the Land Agent.

13. Public Information

Copies of this Policy will be available to the public, by making a request to the Land Agent. A copy of this Policy will be located at the Estate Office for information purposes to members of staff.

14. System Maintenance & Monitoring

1. The system will be maintained in accordance with the Data Protection Act 1998.
2. The system will only be maintained and monitored by companies which carry the relevant accreditation from Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).
3. The companies will be selected using The Estate's contractor guidance document.
4. It will be the responsibility of the Head of Security 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.

5. It will be the responsibility of Head of Security to arrange regular system reviews with the maintaining company.

15. Summary of Key Points

- This CCTV Usage Policy and on-going requirement for CCTV systems will be reviewed on an annual basis.
- The CCTV system is owned and operated by The Estate.
- The CCTV system cannot be accessed by visitors/members of the public except by prior arrangement with the Land Agent and with good reason.
- Liaison meetings may be held with the police and other bodies.
- Copies of downloads may only be viewed by authorised staff and the police.
- Copies required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Usage Policy.
- Any breaches of this Policy will be investigated by the Land Agent. An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the Land Agent.

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