

CCTV Policy

Policy Owner

Sarah Davies (Chief Finance Officer & Corporate Services Director)

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V1.0

Policy Contact

Data Protection Officer

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Owning Department

Legal

Reason for Policy

This policy outlines the purpose, use and management of CCTV systems on RNLI premises and details the procedures to be followed in order to ensure the organisation complies with relevant legislation and guidance. This policy does not cover cameras on lifeboats.

Applicability

All staff and volunteers involved in the installation, management, or usage of CCTV cameras on RNLI premises.

Policy Introduction

The organisation owns Closed Circuit Television (CCTV) systems that are managed by the RNLI and its appointed agents at RNLI locations primarily to:

- protect the RNLI's buildings and assets
- increase personal safety and reduce the risk of crime
- support law enforcement bodies in a bid to deter and detect crime
- assist in identifying, apprehending and prosecuting offenders
- protect members of the public and private property

CCTV footage will not be used for any other purposes and its use will be reviewed by the System Manager/Responsible Person regularly.

CCTV footage will be retained for a period of no longer than 31 days, after which they will be disposed of, unless there is an ongoing reason to keep them for the purposes named above. Images are stored securely and can only be accessed by authorised individuals.

Images must not be provided to third parties, with the exception of law enforcement bodies, auditors or insurance companies (for example, in the instance of damage to property). Any requests for footage must be referred to the Data Protection Team to manage.

The RNLI is the 'data controller' for the images produced by CCTV systems. The RNLI is registered with all relevant regulators such as the Information Commissioner's Office in the UK and the Data Protection Commission in the Republic of Ireland etc. and operates to meet the requirements of all relevant laws, regulations, and guidance.

Procurement

New systems must not be independently installed at locations and must go through the request process. To raise a request for a new system, see the IT Self Service page on Compass and submit a CCTV request, a risk assessment will then be carried out to determine what is required.

Donations of systems must not be accepted unless in line with approved RNLI systems.

Camera sites

The RNLI operates CCTV at a number of locations across its estate.

- Across the RNLI Poole Support Centre, West Quay Road Poole
- Regional Bases (RNLI RB)
- Support Centres (RNLI SC)
- Inshore Lifeboat Centre (ILC)
- Lifeboat Stations (LBS)
- Beach Lifeguard Units (BLU)
- Any other RNLI site (whether single occupancy or shared) (e.g. museum, shop, etc.)

Camera locations

- Cameras (fixed and dome) are located at strategic points throughout the RNLI estate, principally at the perimeters, entrance and exit points of buildings.
- Cameras must be located in such a way that they only monitor those areas which are authorised to be covered by the equipment.
- Permission must be obtained from adjoining landowners if cameras are required to capture images beyond RNLI land boundaries. If required, the RNLI Legal Department will manage this process.
- Cameras must be restricted so that operators cannot adjust or manipulate them to overlook spaces which are not authorised to be covered by the scheme.
- Where practicable, systems must be capable of masking neighbouring spaces to prevent inadvertent collateral intrusion.

Signage

Warning signs, as required must be placed at access points to areas covered by the CCTV system to inform of the existence of the system.

Storage and Retention of Images

- The recorded images shall be stored on secure systems in a place to which access is restricted to the System Owner/Responsible Person.
- Any copies made for evidential purposes must be stored in a fire-proof safe/container to ensure their safety.
- Images and footage must not be retained for longer than a maximum of 31 days unless there is a legal reason to do so.
- CCTV footage retained for the purposes of disciplinary processes will be retained until the expiry of two years following the completion of all disciplinary procedures, including any appeals process and statutory reporting to professional bodies.

Management of Poole Support Centre Security Gatehouse Control Room

- When not manned the Control Room must be kept secured.
- Access to the Control Room will be limited to authorised personnel while recorded data is being viewed.
- If out of hours emergency maintenance arises, the System Manager/Responsible Person must be satisfied of the identity and purpose of contractors before allowing access to the Control Room. Details of visitors including time/date of entry and exit will be recorded.
- The System Manager(s) must satisfy themselves over the identity of any other visitors to the Control Room and the purpose of the visit. Where any doubt exists access will be refused.

- Images displayed on monitors must not be visible from outside the Control Room and access to the Control Room is strictly limited.
- All security staff working in the Control Room must be fully trained and aware of the sensitivity of handling CCTV images and recordings.
- Detailed procedures for the management of the CCTV System are included in the overall Control Room Standard Operating Procedures (SOPs).

Covert recording

The use of covert cameras is strictly prohibited. A request to use covert cameras may be made on the rare occasions where a series of criminal acts have taken place in an area not normally covered by CCTV. A request must be made to the Data Protection Team (data_protection@rnli.org.uk) clearly stating the purpose and will require the written authorisation of the relevant Director, the RNLI Data Protection Officer, and, where this may involve members of staff, the Head of People Services.

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

Any covert recording authorisation must be reviewed every 14 days.

Any decision to use covert surveillance for any reason must be fully documented and records of such decision retained securely.

Applications for Disclosure of Images

Disclosure of recorded material will only be made to third parties under the lawful basis of legal obligation. All such requests must be referred to [data_protection@rnli.org.uk for processing.](mailto:data_protection@rnli.org.uk)

- Viewing of live images on monitors must be restricted to authorised staff only.
- Requests for staff to view images must be authorised via data_protection@rnli.org.uk.
- Images will only be released to law enforcement bodies on the clear understanding that the recording remains the property of the RNLI.
- Applications received from any outside bodies (e.g. solicitors, insurers, media) to view or release personal data stored by the RNLI will be referred to data_protection@rnli.org.uk.
- At no time will unauthorised persons be permitted to view recorded images or live feeds.

Subject Access Request

Anyone who believes that they have been filmed by the CCTV system can request to see the recording by contacting data_protection@rnli.org.uk. Any such requests received must be forwarded to the Data Protection Team immediately to ensure statutory time periods for completion can be met.

Use of CCTV for disciplinary purposes

Only in the following circumstances may CCTV footage be used in disciplinary proceedings:

- CCTV footage reveals activity that the RNLI could not reasonably be expected to ignore, such as acts which constitute Gross Misconduct in accordance with the RNLI's Disciplinary Policy.
- Practices which seriously jeopardise the health and safety of others.

Access given to the employee during disciplinary proceedings:

- CCTV footage identified will be presented to the employee. Therefore, the employee will not be required to make a Data Subject Access Request to view the CCTV footage as part of this procedure.
- The employee will be given the opportunity to review the CCTV footage and explain or challenge its content.
- The employee will also be permitted to make representations with regard to the CCTV footage in any disciplinary hearing.

1. Related Policies, Procedures and Guidance

- CCTV Procedures for Regional Lifeboat, Lifeguard, Retail and Other Premises
 - RNLI SOP 40
 - RNLI SOP 42
 - Data Protection Policy
 - Information & Data Retention Policy
 - Information Security Policy
 - Acceptable Use Policy
 - Data Governance Policy
 - RNLI Privacy Policy
 - Data Subject Request Procedures
 - Data Protection Impact Assessment Procedures
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Next review date

01/06/2026

Amendment history

Date	Version	Author/Contributor	Amendment details
31/10/2025	1.0	Tina McGoldrick	Move to New Template Only

Review frequency

3 years

Appendix A – CCTV Signage Guide

Where to Place CCTV Signs

1. Place 1 main sign by any external camera- this sign will be the one displaying public safety/crime and prevention & contact details (for any subject access requests)
2. Try to cover every main area of the station e.g. a sign on the entrance where the camera is, a sign on the back of the building and one inside (if there are cameras in there too).

Ordering the signage:

1. If the station/premises **has a corporate account** with <https://www.safetyshop.com/> and a corporate credit card (it is likely ALB stations will) order the following signs:

Primary Signage: <https://www.safetyshop.com/these-premises-are-under-cctv-surveillance-cctv-signs.html>

Secondary Signage: <https://www.safetyshop.com/tabletop-signs-24-hour-cctv-operation.html>
(297 210 mm)

2. If the station does not have a corporate account then order the following signs on your corporate credit card whilst at the station, you will need to attribute the cost to the regional base cost centre on concur:
 - Ireland: 12855
 - South East: 12852
 - South West: 12853
 - Wales and West: 12854
 - Scotland: 12850
 - North and East: 12851

Primary Signage: <https://www.safetysigns4less.co.uk/Safety-Signs/Hazard-Specific-Signs/Vehicle-Safety-Signs/These-Premises-Are-Monitored-By-CCTV-Portrait> (300 x 400 mm, 1mm Rigid Plastic)

Secondary Signage: <https://www.safetysigns4less.co.uk/Safety-Signs/Hazard-Specific-Signs/Vehicle-Safety-Signs/24-Hour-CCTV-In-Operation-Portrait> (200 x 300 mm, 1mm Rigid Plastic)

