



CCTV POLICY

Brent Lodge Bird and Wildlife Trust, also known as Brent Lodge Wildlife Hospital

Last updated 25/10/19

Charity	Means Brent Lodge Bird and Wildlife Trust, a registered charity.
GDPR	Means the General Data Protection Regulation.
Responsible Persons	Means Robert Knight, Asha Park, Elizabeth Faulkner and Emma Ashcroft

Under GDPR policies Brent Lodge Bird and Wildlife Trust has created a CCTV policy. All responsible persons are to ensure maximum compliance and to share this policy with people in their departments.

WHEN YOU VISIT ONE OF OUR SHOPS OR OUR WILDLIFE HOSPITAL

CCTV

When you visit one of our shops or our Hospital your image may be recorded on CCTV (closed circuit television). In order to protect our customers, tenants, premises, assets, employees and volunteers from crime we operate CCTV systems in our shops and our Hospital, which record images for security. We do this on the basis of our legitimate interest and to enable us to protect the individuals we interact with.

In our shops we use CCTV to prevent fraudulent activity. We will use CCTV recording where it is required as evidence for internal investigations, for the prevention and detection of crime and for other requirements where permitted by law. We do this on the basis of our legitimate interest. Our aim is to protect the individuals that include customers, staff and volunteers we interact with, from the effects of criminal activities, particularly fraud.

If we discover any criminal activity or alleged criminal activity through our use of CCTV we will process this data for the purposes of preventing or detecting unlawful acts. We hold CCTV images for up to 14 days (unless there is a specific evidential or operational reason for retaining these for a longer period from the date of recording). Signage will be displayed where this takes place.

INCIDENT REPORTING

If you visit one of our shops or our Hospital and are involved in an accident or incident, details of the incident or accident will be recorded in our reporting system along with your name, address and contact details. This information may need to be shared with our insurers, the police or courts to enable the incident to be investigated or to deal with any claims. Our lawful basis for processing this information is legitimate interests.

END OF POLICY

DATA PROTECTION POLICY

DEFINITIONS

Charity	Means Brent Lodge Bird and Wildlife Trust, a registered charity.
GDPR	Means the General Data Protection Regulation.
Responsible	Means Robert Knight, Asha Park, Elizabeth Faulkner and Emma Ashcroft

Persons	
Register of Systems	Means a register of all systems or contexts in which personal data is processed by the Charity. Personal data is stored on our Supporter Database Donor Perfect, Xero accountancy software and WIX website.

1. DATA PROTECTION PRINCIPLES

The Charity is committed to processing data in accordance with its responsibilities under the GDPR. Article 5 of the GDPR requires that personal data shall be:

- a. processed lawfully, fairly and in a transparent manner in relation to individuals;
- b. collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes;
- c. adequate, relevant and limited to what is necessary for relation to the purposes for which they are processed;
- d. accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay;
- e. kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals; and
- f. processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

2. GENERAL PROVISIONS

- a. This policy applies to all personal data processed by the Charity.
- b. The Responsible Persons shall take responsibility for the Charity's ongoing compliance with this policy.
- c. This policy shall be reviewed at least annually.
- d. The Charity shall register with the Information Commissioner's Office as an organisation that processes personal data.

3. LAWFUL, FAIR AND TRANSPARENT PROCESSING

- a. To ensure its processing of data is lawful, fair and transparent, the Charity shall maintain a Register of Systems.
- b. The Register of Systems shall be reviewed at least annually.
- c. Individuals have the right to access their personal data and any such requests made to the charity shall be dealt with in a timely manner.

4. LAWFUL PURPOSES

- a. All data processed by the charity must be done on one of the following lawful bases: consent, contract, legal obligation, vital interests, public task or legitimate interests ([see ICO guidance for more information](#)).
- b. The Charity shall note the appropriate lawful basis in the Register of Systems.
- c. Where consent is relied upon as a lawful basis for processing data, evidence of opt-in consent shall be kept with the personal data.
- d. Where communications are sent to individuals based on their consent, the option for the individual to revoke their consent should be clearly available and systems should be in place to ensure such revocation is reflected accurately in Charity's systems.

5. DATA MINIMISATION

- a. The Charity shall ensure that personal data are adequate, relevant and limited to what is necessary for relation to the purposes for which they are processed.
- b. Considerations to this need relate to legal wildlife "ownership" matters and retail gift aid systems.

6. ACCURACY

- a. The Charity shall take reasonable steps to ensure personal data is accurate.
- b. Where necessary for the lawful basis on which data is processed, steps shall be put in place to ensure that personal data is kept up to date.

7. ARCHIVING / REMOVAL

- a. To ensure that personal data is kept for no longer than necessary, the Charity shall put in place an archive policy for each area in which personal data is processed and review this process annually.
- b. The archiving policy shall consider what data should/must be retained, for how long, and why.
- c. The charity has also taken steps to ensure that in addition to the archiving policy a destruction policy has been created and enforced.

8. SECURITY

- a. The Charity shall ensure that personal data is stored securely using modern software that is kept up-to-date.
- b. Access to personal data shall be limited to personnel who need access and appropriate security should be in place to avoid unauthorised sharing of information.
- c. When personal data is deleted this should be done safely such that the data is irrecoverable.
- d. Appropriate back-up and disaster recovery solutions shall be in place.

9. BREACH

In the event of a breach of security leading to the accidental or unlawful destruction, loss, alteration, unauthorised disclosure of, or access to, personal data, the Charity shall promptly assess the risk to people's rights and freedoms and if appropriate report this breach to the ICO ([more information on the ICO website](#)).

END OF POLICY

DATA ARCHIVING POLICY

Under GDPR policies Brent Lodge Bird and Wildlife Trust has created a data archiving policy. All responsible persons are to ensure maximum compliance with themselves and to share this policy with people in their departments.

1. Archiving is defined as secured storage of documents and files accessible only by responsible users for the course of ordinary business.
 - 1.1 Paper records shall be archived in secured storage on site locations and storage of such records is used in line with our destruction policy.
 - 1.2 Once a paper document is no longer required to be stored once it's legal compliance of storage has expired the documents will be destroyed with a certified GDPR shredder.
 - 1.3 Electronic files shall only be archived in accordance with our legal obligations relating to that file. All staff and Brent Lodge email account holders are required to periodically ensure all emails and files which are not legally required to hold shall be permanently deleted.
 - 1.4 All electronic files are stored on password protected and encrypted devices.
2. The archiving period of a document both electronic and paper shall be defined and permitted by its head of the department responsible for creating, using, processing, storing and finally destroying the document.
 - 2.1 An archiving period of 1 month may be granted for documents both electronic and paper that have a short limited business purpose such as emails and to comply with industry requirements such as PCI.
 - 2.2 In some cases, an archiving period of years may be necessary for some types of documents both electronic and paper. An example of these currently is "Finders information" for legal wildlife "ownership" reasons and gift aid management. This document is designed to be reviewed annually by each department head ensuring that a maximum legal archive time is only used.
 - 2.3 Once possibility conflicting legal requirements of data archiving have been reviewed this document will be updated to reflect and list all documents legally required to be securely archived.
 - 2.4 In accordance with GDPR, anyone requesting further clarification about any data held will be directed to the relevant department head so the clarification can be answered and given quickly with that person being given full access to any data held once responsible checks have been answered.
3. After the archival period has expired, documents shall be destroyed by responsible persons in accordance with the Brent Lodge Bird and Wildlife Trust data destruction policy.

- 3.1 For the purposes of enforcing archiving in accordance with this policy and GDPR requirements each head of department is responsible for the document types it creates, uses, stores, processes and destroys.
- 3.2 From this date, it is of instruction from the General Manager that head of departments responsible for enforcing the retention, archiving and destruction of documents communicate this policy and it's enforcement to the relevant employees.

END OF POLICY

DATA DESTRUCTION POLICY

Under GDPR policies Brent Lodge Bird and Wildlife Trust has created a data destruction policy. All responsible persons are to ensure maximum compliance and to share this policy with people in their departments.

1. Destruction is defined as physical or technical destruction sufficient to render the information contained in the document irretrievable by ordinary commercially available means.
2. Brent Lodge Bird and Wildlife Trust shall maintain and enforce a destruction policy.
3. Paper documents will be shredded by a GDPR certified shredder.
- 3.1 Paper documents in archive storage shall be regularly reviewed by heads of department with a label clearly stating the destruction date of the document.
- 3.2 Once that date has expired all information on that document shall be destroyed.
4. Electronic documents are to be permanently deleted when their relevant use to the business has ceased. See Brent Lodge Bird and Wildlife Trust Data archiving policy for more information.
- 4.1 Electronic information such as CD-ROMs, DVDs shall also be subject to shredding.
5. Where possible two members of the responsible person list are to ensure they are present together when destroying data to ensure all policies are observed correctly.
6. Heads of departments shall be responsible for implementing this policy and ensuring that employees understand this policy and that they perform the processes and procedures to execute this policy.
7. This policy will be reviewed annually.
8. The General Manager shall audit all department heads annually to ensure that full compliance with this policy is kept.

END OF POLICY