



# CCTV Policy

## Brent Lodge Wildlife Hospital

Last updated 03/07/2023

<b>Charity</b>	Means Brent Lodge Wildlife Hospital, a registered charity.
<b>GDPR</b>	Means the General Data Protection Regulation.
<b>Responsible Persons</b>	Means Robert Knight, Asha Park, Elizabeth Faulkner and Emma Ashcroft

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

### **When you visit one of our shops or our hospital**

#### **CCTV**

When you visit one of our shops or our Wildlife Hospital, your image may be recorded on CCTV (closed-circuit television). To protect our customers, tenants, premises, assets, employees and volunteers from crime, we operate CCTV systems in our shops and our wildlife hospital, which record images for security. We do this based on 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 other requirements if permitted by local law. We do this based on our legitimate interest. We aim to protect the individuals which 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 to prevent or detect unlawful acts and or pass onto the authorities.

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 wildlife 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

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### Definitions

<b>Charity</b>	Means Brent Lodge Wildlife Hospital, a registered charity.
<b>GDPR</b>	Means the General Data Protection Regulation.
<b>Responsible Persons</b>	Means Robert Knight, Asha Park, Elizabeth Faulkner and Emma Ashcroft
<b>Register of Systems</b>	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, Tresorit, Google Workspace 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 concerning 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 inaccurate personal data, 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 the implementation of the appropriate technical and organisational measures required by the GDPR 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 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. Responsible Persons shall take responsibility for 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 promptly.

#### **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" matter 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 and 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

The above policy applies directly to both Brent Lodge Wildlife Hospital Charity no. 1199715 and Brent Lodge Bird and Wildlife Trust Charity no. 276179