

Privacy Notice – Closed-circuit television - CCTV

Who we are

London Borough of Havering (LBH) is registered with the Information Commissioner's Office (ICO) as a 'Data Controller' This privacy notice applies to you ('the service user') and LBH ('the Council'). The Council takes the privacy of your information very seriously.

This privacy notice relates to our functions relating to the operation of Closed-circuit television (CCTV). It provides additional information that specifically relates to this particular processing, and should be read together with our [general privacy notice](#), which provides more detail.

What data do we collect

LBH has CCTV in operation at various sites such as town centres, council offices, libraries, car parks, Council social housing, residential streets and other public buildings. There are signs in place to inform you where cameras are in use.

The data we collect is real time footage showing residents, employees, visitors and members of the public which is captured by our CCTV cameras and stored on our systems.

It is possible that some more sensitive information, known as special category data, may be processed passively if the footage collected reveals an individual's ethnic or racial origin, or data concerning their health – if, for instance, they have a visible physical disability.

Where there is a security incident captured on our CCTV footage, some criminal offence data may also be processed.

Why we collect and use your data

The data collected will be processed for one or more of the following purposes:

- to detect, prevent or reduce the incidence of crime, and protect our buildings and assets from damage, disruption, vandalism or other criminal activity
- to prevent, reduce and respond effectively to all forms of possible harassment, disorder and anti-social behaviour
- to reduce the fear of crime
- to create a safer environment
- to identify and/or monitor risk and vulnerability
- to provide emergency services assistance
- countering terrorism
- improving traffic management
- to assist with health and safety and other serious occurrences, including employment issues, for example, disciplinary investigations, where appropriate to do so
- to assist in providing the safety and security of residents, employees, members of the public, buildings and assets
- to assist in the effective resolution of any disputes or legal or insurance related claim involving ourselves

The lawful basis for processing your data

The lawful basis we use to process your data as set out in UK data protection legislation are:

- GDPR Article 6(1)(c) Legal obligation: the processing is necessary for us to comply with the law
- GDPR Article 6(1)(e) Public task: the processing is necessary for us to perform a task in the public interest or for our official functions, and the task or function has a clear basis in law
- GDPR Article 6(1)(f) Legitimate Interests: the processing is necessary for our own legitimate interests

Where we process special category data, the lawful basis is:
GDPR Article 9(2)(g): processing is necessary for reasons of substantial public interest

The relevant basis in UK law is set out in section 10(3) of the DPA 2018. This means that we're required to meet one of the 23 specific substantial public interest conditions set out in Schedule

1. The substantial public interest condition is one or more of the following:

- Sch 1 para 7: Administration of justice
- Sch 1 para 10: Preventing or detecting unlawful acts
- Sch 1 para 11: Protecting the public
- Sch 1 para 20: Insurance

Where personal data relating to criminal allegations or offences is processed, this will be carried out only where authorised under UK law in compliance with GDPR Article 10 and will meet one or more of the following conditions set out Schedule 1, Part 3 of the Data Protection Act 2018:

- Sch 1 para 33: Legal Claims
- Sch 1 para 36: Substantial Public Interest
- Sch 1 para 37: Insurance Claims

Who we will share your data with

Sometimes we need to share your information with others. We will only do this when it is necessary and proportionate, or if we are required to do so by law. This may include in the event of a security incident or suspected security incident, footage may be shared with third party organisations such as the police. We may also be asked for footage from insurance companies should there be an incident involving car accidents on roads covered by our CCTV or damage to cars parked on council premises.

CCTV footage will only be processed internally by council staff who are authorised to do so and any other departments where there is a legitimate and lawful reason for their involvement, such as our environmental teams or HR colleagues in the event of an investigation.

CCTV footage will not be used for marketing or automated purposes.

How long we will keep your data

We will keep your data safe and secure in line with our retention Schedule, which is likely to be up to 30 days before it is overwritten.

CCTV footage used for investigation purposes may be held longer and securely destroyed after it is no longer needed for that purpose.

How do we protect your data

We comply with all laws concerning the protection of personal information and have security measures in place to reduce the risk of theft, loss, destruction, misuse or inappropriate disclosure of information. Staff access to information is provided on a need-to-know basis and we have access controls in place to help with this.

Know your rights

We process your data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Find out about your individual rights at [Havering data privacy statement and your data rights | Data protection | The London Borough Of Havering](#) or at <https://ico.org.uk/your-data-matters/> If you have any queries or concerns relating to data protection matters, please email: dpo@haverling.gov.uk