

## **GUIDELINES ON THE USE OF PERSONAL CAMERAS AND VIDEO RECORDING DEVICES**

### **1. Background**

Over the past years, members of Halliwick Park Allotment Holders Association Limited (the Association) experienced an increase in the number of criminal acts in communal areas or members plots, such as theft, damage or vandalism of property, items and produce.

The committee wants everyone to feel welcome and safe in the grounds of the allotment sites and their own allotments.

### **2. Reason for allowing personal recording devices**

Some plot holders have requested permission to install personal cameras and video recording devices to protect their plots from criminal activity. The use of personal cameras and video recording devices has been agreed by the Association as they offer a level of protection.

The devices are owned by the plot holder and are therefore not under the control of the Association. However, the Association has developed the following guidelines to ensure members comply with current GDPR and Privacy Laws and do not infringe on the privacy of other members.

### **3. Guidelines**

- Personal cameras and video recording devices are solely the responsibility of individuals who must act responsibly and ensure they are familiar with current legal requirements for using personal cameras and video recording devices and adhere to them.
- Cameras and video devices should be positioned with care to ensure that reasonable privacy expectations of others are not violated.
- Significant effort should be put to select locations for the installation of cameras to protect the privacy of others.
- Cameras should not be positioned in ways that deliberately capture areas where privacy is expected such as toilets or other plot members areas.
- Owners should position their cameras to only capture their own plot and as little communal area as possible.
- Where it cannot be avoided that the camera or video device captures images past the owner's boundary, i.e. a public area or communal space, then data protection law applies of which the individual is responsible for complying with.
- Individuals using their own cameras or video devices, must ensure they let other people know they are using cameras in their plots, by displaying a sign in their plot, denoting cameras are used that can be seen by others.
- Owners of the camera or video devices must delete footage on a regular basis or automatically or both.
- All audio must be turned off for any video recordings taken.



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- Owners of cameras or video devices must not publish the footage taken in any means or form.
- Owners of cameras or video devices must only pass on images or video to the committee or to law enforcement if a crime has been committed.
- Any subject access requests are between the owner of the camera or video device footage and the requestor.
- The Association will not contribute towards the cost of any subject access requests to an individual with such personal devices.
- The Association will not contribute towards the cost of any lost, damaged or stolen personal cameras or video devices.
- All devices being used are at the risk of the owner.
- The Association reserves the right to remove any personal cameras or video devices if they feel they do not comply with the rules or regulations stated in this document.

#### **4. Complaints**

If anyone has concerns about the position of a personal camera or video device, they must speak to the owner of the camera in the first instance.

If this communication is unsuccessful, they can put their concerns in writing to the Association who will investigate their complaint.

#### **5. Further information**

Other allotment holders have the right to question the use of cameras and on some occasions request a copy of their CCTV footage. To determine when and how the law applies, please visit <https://ico.org.uk/for-the-public/>

If you need advice on dealing with a request for personal information, or using domestic CCTV, the ICO can assist you. You can visit their website <https://ico.org.uk> or contact them on 0303 123 1113.

Information on domestic system <https://ico.org.uk/for-the-public/domestic-cctv-systems/>