

CCTV Policy

1. About this Policy

This Policy describes why City Building uses close circuit television cameras (CCTV) on its property and what use it makes of the images recorded.

It has been prepared in relation to our obligations as a “data controller” under the Data Protection Act 2018 (DPA) and updates via Data Use and Access Act (2025).

The policy is designed to ensure that personal data consist of the images of people picked up by our CCTV systems (“data subjects”) are processed fairly by ensuring that the data subjects have made readily available to them the following information:

- The identity of the data controller.
- The purpose or purposes for which the data are processed; and
- Any further information the data subjects should be given in the interests of fairness.

It is also intended to ensure that City Building’s use of CCTV fully complies with the code of practice on the use of CCTV issued by the Information Commissioner.

The policy should be read alongside our Operational Procedures on CCTV which give more detailed information to staff on the deployment and maintenance of CCTV systems and the management of recorded images and monitoring stations.

2. Purposes of CCTV

CCTV systems are installed in our premises for several reasons. Principally they are installed for purposes of the prevention, investigation and detection of crime. They are also used to enhance the safety of our staff and the public. Whilst not its principal function, CCTV footage may in appropriate circumstances be used in connection with staff discipline.

All City Building CCTV systems are controlled by City Building which is the data controller of the images recorded for the purposes of the Data Protection Act 2018.

3. Scope of City Building CCTV Systems

City Building operate CCTV cameras across our properties. All areas covered by cameras will have visible and legible signs advising people entering the areas where CCTV is in operation. The corporate style of the sign is attached as an Appendix to this document. The telephone number on the signs is that of 0800 595595 who can provide additional information (including copies of this policy) to anyone making enquiries.

4. Management and Retention of Images

Storage of images varies from system to system. Most systems use video recording and are stored and managed locally. All images will be retained for 30 days, unless a different retention period has been approved in writing by City Building's Data Protection Officer. After this period the images are permanently deleted unless required for an ongoing issue which has been identified (e.g. if a crime has been observed and recorded or if the images have been retained while another subject access request is being processed). Until deleted all recordings are held securely and will be password protected.

5. Access to and Disclosure of Images

Real time access to monitoring screens is restricted to designated staff (as approved by the Head of Service) who have been informed of the contents of this policy through a recorded mandatory Toolbox Talk. Monitoring screens are located privately to prevent members of staff or any member of the public from seeing the images.

Once images have been recorded access to them is only permitted as follows:

- If an incident has been spotted by an officer or is subsequently brought to City Building's attention the tape may be reviewed by a supervisor (as approved by the Head of Service) to verify the incident and decide what further action is necessary (if any).
- Any incidents revealed will be brought to the attention of City Building's Head of Service for the service/premises in question. This may involve making a copy of the recording or a screen print. Recordings/screen prints may be used as evidence in any subsequent disciplinary hearings or civil/criminal court proceedings or during other regulatory proceedings.
- In cases of suspected criminal activity, the recordings will normally be passed to the Police and/or Procurator Fiscal for investigation and possible prosecution. Disclosure may also be made to other law enforcement agencies (e.g. Customs and Excise) and other public bodies with regulatory functions.

The Police and other law enforcement agencies may, on showing good cause, request copies of recordings or access to monitoring screens. In general, such requests will be complied with. It should be noted that individual operators are not themselves entitled to access stored images except in cases of genuine emergency. All access to stored images or monitoring screens, making copies of recordings or screen prints must be fully logged in accordance with City Building's operational procedures.

No employee of City Building is authorised to disclose recorded images other than for the above purposes. Anyone attempting to procure recordings from City Building or any of its employees other than as permitted by this policy may be committing a criminal offence.

Employees who knowingly or recklessly disclose details in breach of this policy and the operational guidelines may also commit an offence and/or be subject to disciplinary proceedings including dismissal.

6. Access by Data Subjects.

Under the Data Protection Act, “data subjects” have the right to see the data held on them. For CCTV this means anyone whose identifiable image is recorded can request access to the recorded images.

Any request must be made in writing but a proforma application form will be sent out in response to telephone enquiries. In order for City Building to respond to a request it must be provided with sufficient details to allow it to locate the information, together with the applicable fee and must also be satisfied as to the applicant’s identity and the authority of anyone acting on their behalf. The standard application form is designed to facilitate this process. As permitted by the relevant Regulations, City Building will charge a fee of £10.00 for CCTV subject access requests. This fee is not refundable. City Building will review its policy on levying this charge on an annual basis.

In general, anyone making a subject access request will be asked if they simply wish to view the recording or if they would like a copy. Copies are provided on a standard format.

Viewing of recordings must be done at City Building premises where appropriate private viewing facilities will be made available. To avoid disclosing personal data relating to other individuals the images of other people may be blacked out or blurred.

The process of blurring the images may be carried out by third parties acting on behalf of City Building. In this event the disclosure of the recordings to the third party would be in terms of a written contract to ensure compliance with applicable Data Protection laws.



CCTV IN OPERATION

We use CCTV to help
prevent crime and
keep our staff and
our buildings safe.

For more information:

Call: 0800 595 595

Visit: citybuildingglasgow.co.uk



OPERATIONAL MANUAL

Location of Cameras

Our cameras are located at strategic points throughout our business premises, principally at the entrance and exit points. Our cameras and signage are visible and situated as follows:

- Darnick Street main site perimeter (entrances, exits and fence lines)
- Darnick Street carpet stores
- Darnick Street main stores internal
- Darnick Street reception
- Darnick Street transport fuel pump
- Darnick Street waste area
- RSBi main factory
- RSBi window factory
- Unit B, Lochside Industrial Estate, Iron Grey Road, Dumfries *
- Training College

* Records to Receiving Centre at Blochairn, Glasgow.

Recording and retention of images

Images produced by CCTV are intended to be as clear as possible, so they are effective for the purposes set out in our policy. Maintenance checks and servicing of the equipment is carried out twice per year to ensure it is working properly.

Our staff are trained on the operation and administration of the CCTV systems by our system installer as well as the impact of the laws regulating data protection and privacy with regard to the system.

Images are recorded in constant real-time (24 hours per day throughout the year). As the recording system records digital images, any CCTV images are held on hard drive are overwritten on a recycling basis as set out in our policy.

Access to and disclosure of images

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected, as set out in our policy.

The images that are recorded are held in secure locations throughout the organisation. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the systems.

Viewing of recorded images are as set out in our policy. Disclosure of images to other third parties will only be made in accordance with those set out in our policy.

Individuals' access rights

Any request must be made in writing but a proforma application form will be set out in response to telephone enquiries. For City Building to respond to a request it must be

provided with sufficient details to allow it to locate the information, together with the applicable fee and must also be satisfied as to the applicant's identity and the authority of anyone acting on their behalf. The standard application form is designed to facilitate this process. As permitted by the relevant Regulations, City Building will charge a fee of £10.00 for CCTV subject access requests.

Complaints

We aim to directly resolve all complaints. If your complaint is about how we handle your personal information, you can contact our Data Protection Officer. Contact details are dataprotection@glasgow.gov.uk

APPLICATION FOR CCTV DATA ACCESS

Please note as permitted by the relevant Regulations, City Building will charge a fee of £10.00 for CCTV subject access requests.

Personal Details

Name and address of Applicant:

Name and address of "Data Subject" – i.e. the person whose image is recorded:

If the data subject is not the person making the application, please obtain a signed consent from the data subject and include below:

If it is not possible to obtain the signature of the data subject, please state your reasons:

Please state your reasons for requesting the image:

Date on which the requested image was taken:

Time at which the requested image was taken:

Location of the data subject at time image was taken (i.e. which camera or cameras):

Full description of the individual, or alternatively, attach to this application a range of photographs to enable the data subject to be identified by the operator:

Please return this form to CBIT Team, City Building (Glasgow) LLP, 350 Darnick Street, Glasgow G21 4BA or email to marketing@citybuildingglasgow.co.uk

