

St David Aparthotels – CCTV Policy

Effective Date: November 2024

1. Introduction

1.1 St David Aparthotels (“the Company”) uses Closed Circuit Television (CCTV) systems across its premises for the purposes of crime prevention, public and staff safety, and the protection of property.

1.2 This policy outlines the principles governing the use, management, and operation of CCTV equipment and recorded images, in compliance with:

- The **Data Protection Act 2018**
- The **UK General Data Protection Regulation (UK GDPR)**
- The **Surveillance Camera Code of Practice (Home Office, 2021)**
- Relevant guidance from the **Information Commissioner’s Office (ICO)**

1.3 CCTV is operated in line with the Company’s legal obligations. For details on how we handle personal data more generally, please refer to our **Privacy Policy**.

1.4 This policy applies to **all properties operated by St David Aparthotels** now and in the future, without the need to list them individually.

2. Objectives

2.1 The objectives of the Company’s CCTV systems are to:

- Assist in the prevention, detection, and investigation of crime.
- Safeguard the safety and security of guests, staff, and visitors.
- Protect Company property and assets.
- Support law enforcement agencies in the identification, apprehension, and prosecution of offenders.
- Support internal investigations and disciplinary proceedings where relevant.

3. Operation of the System

3.1 Management

- The CCTV system is owned and operated by St David Aparthotels.

- Day-to-day management rests with authorised personnel designated by the Company.
- The system operates **24 hours a day, 365 days a year**.
- Signage is displayed prominently at access points, in line with ICO requirements, informing individuals that CCTV is in operation.

3.2 Monitoring and Access

- CCTV images are recorded continuously on secure digital systems.
- Cameras are positioned to cover communal, public, and external areas. They will not be directed at private premises or areas where individuals have a heightened expectation of privacy.
- Access to live and recorded images is restricted to authorised personnel only.
- CCTV footage will not be used for commercial purposes.

3.3 Limitations

- While every effort is made to ensure effective coverage, the system cannot guarantee recording of all incidents.
- CCTV is intended as a deterrent and investigative tool, not as a replacement for physical security measures.

4. Retention & Disposal of Data

4.1 Recorded images are stored securely for a maximum of **30 days**, unless required for investigation or legal proceedings.

4.2 After the retention period, footage is automatically and securely deleted using digital wiping procedures.

4.3 Footage may be retained beyond 30 days only where:

- Required by law enforcement authorities, or
- Needed as evidence in formal investigations, legal claims, or disciplinary proceedings.

5. Disclosure of Data

5.1 Disclosure of recorded images will be strictly controlled and consistent with the purposes for which the system was established.

5.2 Requests for disclosure may be granted to:

- Law enforcement agencies, where images assist in crime prevention or detection.
- Legal representatives, courts, or insurers where required by law.
- Internal managers, where footage is relevant to disciplinary or grievance proceedings.

5.3 Any disclosure must be formally authorised and documented.

6. Subject Access Requests (SARs)

6.1 Individuals have the right, under the Data Protection Act 2018 and UK GDPR, to request access to personal data relating to themselves, including CCTV images.

6.2 Requests must be made in writing to the **Data Protection Officer** at St David Aparthotels. Proof of identity may be required.

6.3 Responses will be provided within **one month**, unless requests are manifestly unfounded, excessive, or repetitive, in which case a reasonable fee may be charged.

6.4 Access will only be granted where doing so does not infringe the rights and freedoms of others (e.g. where other individuals are identifiable in the footage).

7. Breaches of Policy

7.1 Any misuse of CCTV, including unauthorised access, disclosure, or tampering with recordings, will be treated as a disciplinary offence and may also constitute a criminal offence.

8. System Review & Data Protection Impact Assessments (DPIAs)

8.1 The effectiveness of CCTV systems will be reviewed regularly by authorised personnel.

8.2 A **formal policy review** will take place every **3 years** or earlier if there are legislative changes or significant operational changes.

8.3 A **Data Protection Impact Assessment (DPIA)** will be undertaken for new installations or significant modifications to existing CCTV systems.

9. Staff Training

9.1 All employees authorised to access or handle CCTV data will receive training in:

- The operation of the CCTV system.
- Data protection and privacy principles.
- The rights of individuals under UK GDPR.

10. Complaints

10.1 Complaints relating to the operation of CCTV systems should be addressed to the Company's Data Protection Officer:

Data Protection Officer

St David Aparthotels
Refuge House
33–37 Watergate Row South
Chester
CH1 2LE

11. Policy Enforcement

11.1 St David Aparthotels is committed to ensuring CCTV is operated fairly, lawfully, and transparently.

11.2 Failure to comply with this policy may result in disciplinary action, regulatory penalties, or criminal proceedings.