



Inner Spiritual Journey CCTV Policy

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Date of Issue	September 2024
Date of Review	September 2025
Issued by	Fiona Partridge

1. Introduction

This Policy controls the management, operation, use and confidentiality of the CCTV cameras located at the entrance of The Retreat, and within the Therapy Room itself, owned by Fiona Partridge – *The Data Controller*. It was prepared after taking due account of the Code of Practice published by the Information Commissioner (May 2015).

This policy will be subject to periodic review by The Data Controller to ensure that it continues to reflect the public interest and that it and the system meets all legislative requirements. The Data Controller accept the principles of the 1998 Act based on the Data Protection Principles as follows:

- Data must be fairly and lawfully processed;
- Processed for limited purposes and not in any manner incompatible with those purposes;
- Adequate, relevant and not excessive;
- Accurate;
- Not kept for longer than is necessary;
- Processed in accordance with individuals' rights;
- Secure.

2. Statement of the purpose and scope of operation

The purpose of the 2 camera's within the exterior of The Retreat is to detect vandalism, malicious damage, unwanted access to the property. Internal the camera is solely used within the Therapy Room to ensure professionalism of the Therapist at all times, and to deter theft. A separate area, away from The Therapy Room is available at all times for any Client who has to remove any item of clothing for a specific Treatment. The system will not be used to invade the privacy of any individual. On an individual basis the camera's can be paused recording. Neither of the camera's operate with the sound function turned on. The images are retained on the system for 28 days, unless required as evidence to aid legal action.

3. Responsibilities of the Owner

The Data Controller takes full responsibility for the management and operation of the system. Any major changes that would have a significant impact on either the purpose, scope or policy operation of the system will always be reflected within this document. Visitors, Clients and or Students will be advised prior to attendance of the property of the existence of the cameras.

4. Management of the System and Accountability

Day-to-day operational responsibility rests with the The Data Controller.

5. Control and Operation of the Camera

The following points must be understood and strictly observed:

- The system will only be operated by trained individuals using authorised access devices, this responsibility rests solely with The Data Controller.
- Passwords and access codes for the camera are stored securely and never disclosed. If other access devices are enabled, this will be done with the strictest permission of The Data Controller and only in accordance within the statement and scope of purpose.
- No public access will be allowed to the camera images except for lawful, proper purposes with approval of The Data Controller.
- The Police are permitted access to recorded material if they have reason to believe that such access is necessary to investigate, detect or prevent crime.
- The Data Controller will check, weekly, the accuracy of the date/time displayed.
- Digital records should be securely stored to comply with data protection laws and should only be handled by The Data Controller.

6. The use of camera images

- The system will be accessed at least weekly to ensure that it is fully operational.
- Camera recordings will not normally be viewed unless there is an incident requiring investigation or during the test of equipment.
- Images may be passed to the police in the event of any potential criminal activity associated with The Retreat. Images not directly affecting The Retreat may also be passed to the police on their request.
- Any distribution of recordings whether to police or others, will be logged, including reasons for the access, and full address of those obtaining images.
- Information requests received that are compliant with relevant legislation will be considered and responded to.
- A log of all uses of the system will be maintained by The Data Controller.
- The System is a 'Closed System' meaning that all images are stored locally on a hard – drive, not within a cloud based system.

END