Alexanders

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CCTV and Surveillance Policy

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1. Purpose

The Purpose of this policy is to regulate the management, operation and use of the CCTV system
(Closed Circuit Television) and door entry surveillance at Alexanders Funeral Care.
CCTV systems are installed externally on the premises for the purposes of
enhancing security of the building and its associated equipment as well as for the safety and wellbeing of the staff.
CCTV surveillance at Alexanders is intended for the purposes of:

- protecting the buildings and office assets, both during and after opening hours;
- promoting the health and safety of staff, clients and visitors;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- assisting in investigating incidents on funeral home premises
- The system does not have sound recording capability.

The CCTV system is owned and operated by Alexanders Funeral Care, the deployment of which is determined by the management team.
All authorised users with access to images are aware of the procedures that need to be followed when accessing the recorded images and are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. Scope

This policy relates directly to the location and use of CCTV system. The monitoring, recording and subsequent use of recorded images complies with the Information Commissioner's Office (ICO) CCTV Code of Practice.
The Code of Practice is published at: https://ico.org.uk/media/1542/cctv-code-of-practice.pdf
CCTV warning signs are displayed on reception window.

The CCTV system is designed to cover all external doors and windows, entrance gates, the boundary fence by the neighbouring community facility but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage. This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc. CCTV monitoring of public areas for security purposes within Alexanders Funeral Care premises is limited to uses that do not violate the individual's reasonable expectation to privacy.
Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

3. Location of cameras
The cameras are sited to capture images relevant to the purposes for which they have been installed (as described above) and there is some overlap onto pavements and the neighbouring community facility. Care will be taken to ensure that reasonable privacy expectations are not violated. Cameras are placed in the main and rear external entrances to the funeral home, in the main reception area and the side entrance to the 'chapel garden'.

4. Storage and retention of surveillance images CCTV
Recorded data on the CCTV systems will not be retained for longer than 6 months except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.
Where data is retained for longer 6 months, it will be kept in an hard drive that is arttached to the CCTV system. This will be limited to specific CCTV image/recordings required for criminal or security matters. Images be recorded onto an external drive, eg. DVD or memory stick, when instructed to do so by the police or a court order.
The Data Protection Act and UK-GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will

reflect the Alexanders Funeral Care purposes for recording information, and how long it is needed to achieve this purpose.

5. Access to surveillance images

Access to recorded images will be restricted to authorised staff and will not be made widely available. The authorised staff are the managing director and the business manager. Alexanders Funeral Care approved company for CCTV maintenance also has access to the images and Data Protection Statements are in place.

Supervising the access and maintenance of the CCTV System is the responsibility of the business manager.

When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

6. Subject Access Requests (SAR)

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and UK-GDPR.

All requests should be made in writing to the Alexanders Funeral Care who can be contacted by email to alexandersfuneralcare1@yahoo.co.uk.

Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

Alexanders Funeral Care will respond to requests within 30 days of receiving the request.

The funeral home reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7. Access and disclosure of images to third parties

There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police and service providers to the funeral home where these would reasonable need access to the data (e.g. investigators).

If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the business manager should be contacted in the first instance and appropriate legal advice may be required.

Requests for images should be made in writing to the business manager.

8. Responsibilities

The managing director and business manager will:

- ➢ Ensure that the use of CCTV systems is implemented in accordance with this policy.

- ➢ Maintain a record of access for the release of tapes or any material recorded or stored in the system.
- ➢ Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the academy and be mindful that no such infringement is likely to take place.
- ➢ Ensure that external cameras are non-intrusive in terms of their positions and views of
- ➢ neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- ➢ Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- ➢ Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

9. Policy review

The managing director and business manager are responsible for monitoring and reviewing this policy. This policy will be reviewed every two years.

In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.
Policy date: July 2025
Next review date: June 2027