

SANDWICH LEISURE HOLIDAY PARK

WOODNESBOROUGH ROAD, SANDWICH KENT, CT13 OAA

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VAT REGISTRATION 176 1517 04

Policy: CCTV & Automatic Number Plate Recognition (ANPR)

1. Introduction

Sandwich Leisure Holiday Park uses Closed Circuit Television (CCTV) and Automatic Number Plate Recognition (ANPR) systems to help protect the park, its property, employees, holidaymakers, holiday-home owners and visitors.

This policy explains how CCTV footage and ANPR records are collected, used, stored, accessed and disclosed, and how individuals can exercise their data protection rights.

The park processes personal data in accordance with applicable data protection legislation, including the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy should be read alongside the park's GDPR Privacy Notice, which provides further information about how personal data is processed.

2. Purpose of CCTV and ANPR

The park uses CCTV and ANPR for legitimate business purposes, including:

- Preventing and detecting crime, theft, vandalism and other unlawful activities.
- Protecting the park's property, facilities and equipment.
- Providing a safer environment for employees, holidaymakers, holiday-home owners and visitors.
- Monitoring vehicle movements at park entrances and exits.
- Helping to identify unauthorised access to the park.
- Investigating accidents, incidents, complaints and disputes.
- Supporting health and safety investigations.
- Assisting the police and other relevant authorities where appropriate.
- Enforcing park rules and investigating breaches where relevant.

CCTV and ANPR are used only where the park considers their use necessary and proportionate for these purposes.

3. Location of Cameras and ANPR Equipment

CCTV cameras are installed at strategic locations throughout the park, including entrances, exits, communal areas, facilities and other relevant locations where monitoring is considered necessary.

ANPR cameras are installed at designated vehicle entry and exit points to capture vehicle registration numbers and monitor vehicle movements.

Cameras are positioned to minimise unnecessary intrusion into individuals' privacy. CCTV will not be installed in areas where individuals would reasonably expect a high degree of privacy, such as toilets, showers, changing rooms or other private areas.

Appropriate signage is displayed to inform employees, holidaymakers, owners and visitors that CCTV and ANPR monitoring is in operation.

4. Recording and Retention of Data

CCTV cameras may operate continuously or at specific times, depending on the security requirements of the park.

CCTV systems record video footage. The park's standard CCTV system does not record audio or conversations.

ANPR systems capture vehicle registration numbers and associated information relating to vehicle movements, such as the date and time of entry or exit.

CCTV footage and ANPR records are normally retained for up to 30 days, after which they are automatically deleted or overwritten as part of the normal recording cycle.

Where footage or records are required for the investigation of an incident, suspected criminal activity, a complaint, a legal claim or an investigation by the relevant authorities, the relevant information may be retained for longer where necessary and proportionate.

Any information retained beyond the normal retention period will be securely stored, access-restricted and deleted when it is no longer required.

5. Access to and Security of Recordings

Access to CCTV footage and ANPR records is restricted to authorised personnel who require access for legitimate business purposes.

All recordings and associated data are held securely, with appropriate technical and organisational measures in place to prevent unauthorised access, disclosure, alteration or loss.

Recordings will only be viewed where there is a legitimate reason, such as investigating an incident, responding to a complaint, addressing a security concern or assisting an authorised investigation.

The park will take reasonable steps to ensure that anyone authorised to access CCTV footage or ANPR records understands their responsibilities regarding confidentiality and data protection.

6. Disclosure of CCTV Footage and ANPR Records

CCTV footage and ANPR records will not routinely be shared with third parties. They may be disclosed where there is a lawful and legitimate reason to do so, including:

- The police or other law enforcement agencies for the prevention, detection or investigation of crime.
- Courts, legal representatives or other relevant authorities in connection with legal proceedings.
- Insurers or relevant parties where required to investigate an incident or claim.

- Individuals requesting access to their own personal data, subject to applicable data protection legislation.
- Other parties where disclosure is required or permitted by law.

All disclosures will be assessed on a case-by-case basis to ensure they are lawful, necessary and proportionate.

Where appropriate, requests for disclosure and details of information released will be recorded.

7. Individual Rights and Subject Access Requests

Under data protection legislation, individuals have certain rights in relation to their personal data, including the right to request access to CCTV footage or ANPR records in which they can be identified.

Requests should be made in writing to:

Email: info@sandwichleisurepark.co.uk Address: Sandwich Leisure Holiday Park, Woodnesborough Road, Sandwich, Kent, CT13 0AA.

To help locate the relevant footage or records, individuals should provide as much information as possible, including:

- The date and approximate time of the recording.
- The location where the recording took place.
- A description of themselves or their vehicle, where relevant.
- Any other information that may help identify the footage or records.

The park may request additional information to verify an individual's identity or clarify their request.

Requests will normally be responded to within one month of receipt. Where a request is complex or numerous, the response period may be extended by up to a further two months, where permitted by law. Individuals will be informed if an extension is necessary.

The park may need to obscure images or information relating to other identifiable individuals before providing a copy of the footage or records. Access may also be restricted where an applicable legal exemption applies, such as where disclosure would prejudice the prevention or detection of crime.

There is normally no charge for a subject access request. However, a reasonable fee may be charged, or a request may be refused, where permitted by law, if it is manifestly unfounded or excessive.

8. Covert Recording

The park does not routinely undertake covert CCTV or ANPR monitoring.

Covert monitoring may only be considered in exceptional circumstances, such as where there are reasonable grounds to suspect serious misconduct or criminal activity and informing the individuals concerned would prejudice the investigation.

Before any covert monitoring takes place, the park will assess its necessity and proportionality, consider the potential impact on individuals' privacy, establish appropriate safeguards and obtain appropriate senior management authorisation.

Any covert monitoring will be limited in duration and scope to the specific investigation for which it has been authorised. It will cease when the purpose has been achieved or when it is no longer necessary.

Covert monitoring will be carried out in accordance with applicable data protection legislation.

9. Data Protection and Privacy

All personal data collected through CCTV and ANPR systems will be processed in accordance with the park's GDPR Privacy Notice and applicable data protection legislation.

The park relies on legitimate interests as its lawful basis for processing CCTV footage and ANPR records where this is necessary for the park's security, safety and operational purposes, subject to an assessment of individuals' rights and freedoms.

The park will ensure that personal data is:

- Processed lawfully, fairly and transparently.
- Collected for specified and legitimate purposes.
- Adequate, relevant and limited to what is necessary.
- Accurate where applicable.
- Retained only for as long as necessary.
- Protected against unauthorised access, loss, misuse or disclosure.

Any suspected data breach involving CCTV footage or ANPR records will be reported and investigated in accordance with the park's data protection procedures.

10. Staff Training and Responsibilities

Employees who are authorised to operate, access or manage CCTV and ANPR systems will be made aware of their responsibilities under this policy and applicable data protection legislation.

Access to recordings will be limited to authorised personnel, and employees must not use, disclose, copy or share recordings for personal reasons or any purpose unrelated to their authorised duties.

Any inappropriate access, use or disclosure may result in disciplinary action.

11. Complaints and Enquiries

Any complaints, concerns or enquiries regarding the operation of the park's CCTV or ANPR systems, or the processing of personal data collected through them, should be directed to:

Sandwich Leisure Holiday Park Woodnesborough Road, Sandwich, Kent, CT13 0AA Email: info@sandwichleisurepark.co.uk Telephone: 01304 612681

Individuals who remain dissatisfied with how their personal data has been handled may also lodge a complaint with the Information Commissioner's Office (ICO).

Website: ico.org.uk/make-a-complaint

12. Policy Review

This policy will be reviewed periodically and whenever there are significant changes to the park's CCTV or ANPR systems, the purposes for which they are used, or relevant data protection legislation.

The park will ensure that its use of CCTV and ANPR remains necessary, proportionate and compliant with applicable legal requirements.