



# Canal & River Trust

Making life better by water

## Privacy Schedule for CCTV and Body Worn Cameras

The Trust has a system of closed-circuit television (CCTV) cameras operating at various locations around our network. This schedule sets out the details of our processing of personal information captured from Trust CCTV cameras and body worn cameras ('BWCs').

It is important that you read this section of our privacy schedule together with the main section of our [privacy policy](#). This is so that you are fully aware of how your information is used and your individual rights.

### What information do we collect?

The Trust collects images and video footage caught on the CCTV and body worn cameras.

The Trust has CCTV cameras installed in various locations including:

- Outside some of our museum and attraction sites
- Inside some of our museum and attraction sites
- Outside some of our offices
- Inside the entrance lobby of our Leeds & Milton Keynes Offices
- Around some of our locks and towpaths
- Around some of our other operational assets (e.g. bridges, reservoirs)

The Trust gives the Boat Licence Customer Support Team BWCs while carrying out all official Trust business undertaken in respect of boat licensing and customer support activities. Including but not limited to;

- Inspections and boat data collection
- Delivering letters and documents to boaters
- Enforcement action and activities
- Boat removals
- Moving around on the towpath and / or approaching official boat licensing activities

## **How we use this information?**

The Trust collects personal data through the CCTV system and BWCs for various reasons:

1. Reduction in risk of assault or verbal abuse.
2. To prevent, deter, and if necessary, investigate unauthorised physical access, including unauthorised access to Trust locations which are monitored by CCTV cameras.
3. To prevent, detect and investigate any incidents that may occur within the Trust's property or land. This may include criminal offences or to investigate a missing person.
4. Protect the safety of our colleagues, employees and volunteers, as well as customers and waterway visitors.
5. On occasion, the Trust via a third party, may use CCTV on a temporary basis to assist in the security of a specific site where work is being completed by a contractor. CCTV is used to help maintain security of the site, as a deterrent to unlawful access and to protect the Trust's asset and the contractor's equipment.
6. Assurance of professionalism from our people when interacting with customers.
7. Reduce the fear of crime by helping to provide a safer environment.
8. It provides assurance to boaters and members of the public that negative behaviours from anyone on the waterway will be captured and footage will help support action against those negative behaviours.

The CCTV system and BWCs is not used for any other purpose than mentioned above. It is important to notice that the location and positioning of the video-cameras are such that they are not intended to be intrusive, the cameras are aimed to give a general overview of what's happening in certain places but not to recognize persons.

## **Legal basis for processing**

The legal basis for the Trust's use of any personal data which is captured by the CCTV system is that the processing is necessary for the legitimate interest of the Trust. The Trust has a legitimate interest to monitor its locations in order to deter and detect crime and to help make these locations a safer environment for our employees, volunteers, customers and members of the public.

The legal basis for the Trust's use of footage captured by BWC is that the processing is necessary for the legitimate interest of the Trust. The Trust has a legitimate interest to collect evidence of interactions between employees and volunteers with customers where there is a potential risk of conflict or harm.

## Who has access to data?

The CCTV and BWC footage is retained in a secure environment and is only accessible by authorised personnel within the Trust who have a legitimate reason to do so.

## Who we share your information with?

The Trust will only share CCTV and BWC footage where requested and where we are required to do so by law, or the exemptions outlined in relevant data protection legislation allow us to do so.

We will only share CCTV and BWC footage with:

- CCTV operators
- Internal/external enforcement agencies Trading Standards, HMRC
- Police Forces
- Fire and Rescue Services
- Insurance Companies, but only when authorised by the Data Protection Officer

## How long do we keep this data for?

Under normal circumstances your information could be retained for up to 30 calendar days after which point it will be deleted. Footage required for investigative or evidential purposes may be retained beyond 30 days and is securely disposed of upon completion of the purpose for which it has been retained.

## Your Rights

Under the General Data Protection Regulation, you have the following rights in relation to the collection and processing of your personal information:

- Right to be informed
- The right of access
- The right to rectification
- The right to erasure
- The right to restrict processing
- The right to data portability
- The right to object
- Rights in relation to automated decision making and profiling

To exercise any of these right, please send a description of the personal information in question to our Information Governance Team by email to [information.request@canalrivertrust.org.uk](mailto:information.request@canalrivertrust.org.uk) or by post to Information Governance Team, Legal & Governance, Canal and River Trust, National Waterways Museum Ellesmere Port, South Pier Road, Ellesmere Port, Cheshire, CH65 4FW.

Please note some of these rights may be subject to legal restrictions, which we will tell you about if they do apply in our response to your request.

## **Towpath Counters**

The Trust operate a number of permanent counters that take footage from cameras along the towpath to determine the number of towpath users. The data is anonymised at the point of collection and therefore the Trust does not hold any personal data from these cameras. The data collected is stored and transferred by a third party (Tracsis) and is only used for statistical purposes.

If you are not happy about the way your personal data is being processed, you can complain directly by emailing [information.request@canalrivertrust.org.uk](mailto:information.request@canalrivertrust.org.uk).

Further advice and guidance from the ICO on this issue can be found on the ICO website.

**Last edited: August 2021**