

Privacy Schedule for image capture devices

Closed Circuit Television Cameras (CCTV)

The Trust has a system of closed-circuit television (CCTV) cameras operating at various locations around our network, including but not limited to museums and attraction sites; offices; locks and towpaths; and operational assets (e.g., bridges and reservoirs).

The location and positioning of these cameras are not intended to be intrusive. They provide a general overview of the location, rather than identification of individuals. However, identification may be possible and at times will be necessary (e.g., where there are health and safety concerns or matters of a criminal nature arise). Notices will be in place whenever CCTV cameras are present.

Some of these cameras will be triggered by motion, only recording when motion is detected. Some are accessible via a smartphone application available only to authorised Trust staff for legitimate Trust purposes.

Body Worn Cameras (BWC)

Some Trust staff record interactions via BWCs while carrying out official Trust business, particularly in respect of boat licensing and customer support activities. This includes but is not limited to inspections and boat data collection; delivery of documents; enforcement activities; boat removals; and movement around on the towpath.

The cameras constantly record on a short loop, meaning the footage is overwritten every thirty seconds. No data is physically saved unless the operator activates recording, at which time the previous thirty seconds will be saved along with any subsequent footage until recording is stopped. Cameras will only be activated where, in the opinion of the operator, it is necessary to do so, for example where an incident is occurring.

Automatic Number Plate Recognition Cameras (ANPR)

On certain properties, the Trust operates ANPR cameras. Although the purpose of these cameras is to capture vehicle number plates, images of complete vehicle and/or vehicle occupants may be captured incidentally.

These cameras are not monitored live and will be triggered to record images by the presence of vehicles. Notices will be in place whenever ANPR cameras are present. These notices will also confirm whether the Trust manages the system, or another organisation on its behalf.

For some purposes, the Trust uses image of number plates to refer to the police, the Driver, and Vehicle Licensing Agency (DVLA) and insurance companies and do not collect personal information about the vehicle owner from those agencies in return (except where the police include information in reports). For other purposes (for example where ANPR is designed to enforce parking charges), personal information may be obtained from the DVLA.

Other image capture devices

At times we receive information from other individuals who are present at incidents, for the purpose of evidencing events, or recording interactions between Trust staff or volunteers and our customers or members of the public

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 still images and video footage caught on CCTV cameras, BWCs, ANPR cameras, and other image capture devices. In addition to the images and video footage, BWCs and other image capture devices also capture audio. These images and video footage may capture your as you interaction with Trust staff or incidentally to such interactions. Although ANPR cameras are designed to capture vehicle registration number plates, they may also capture the full vehicle and its occupants.

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, anti-social behaviour, other legal compliance issues (e.g., health and safety regulations) 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.
9. To evidence, and issue financial invoices for parking infringements on Trust land.
10. To evidence and pursue civil claims for damage to Trust property.

Image capture devices are not used for any other purpose than mentioned above.

Legal basis for processing

The legal basis for the processing of the images captured is that it is necessary for the legitimate interests of the Trust.

- The Trust has a legitimate interest to monitor its locations in order to deter and detect crime, damage to property, anti-social behaviour and health and safety infringements, and to help make these locations a safer environment for our employees, volunteers, customers, and members of the public.
- 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.
- The Trust has a legitimate interest to collect evidence of parking infringements in its land to pursue civil compliance remedies.

Who has access to data?

Images and audio are 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 images and audio where requested for legitimate purposes 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 images and audio with:

- CCTV operators
- Internal/external enforcement agencies Trading Standards, HMRC
- Police Forces
- Fire and Rescue Services
- Insurance Companies, but only when authorised by the Information Governance team.
- CCTV operators where appropriate
- The Environment Agency
- Insurance companies

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 UK 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 or by post to Information Governance Team, Legal & Governance, Canal & 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.

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

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