Ownership

The Waste Management service uses CCTV (“the system”) at Bring (Recycling) Sites. The system is owned and managed by Sheffield Council and operated by officers within the Business Regulation and Strategy Directorate. The responsible manager is the Waste Strategy Officer within the Waste Management Service.

Compliance

Images obtained from the system which include recognisable individuals constitute personal data and are covered by data protection law. This Policy should therefore be read in conjunction with the Bring Site CCTV Data Protection Impact Assessment. This policy has been drawn up in accordance with the advisory guidance contained within the Information Commissioner’s CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice.

Purpose

The purpose for processing personal data through use of the system is to identify those who are abusing the sites and fly tipping none recyclable waste. The images captured may include personal appearance and behaviours and Vehicle Registration Markers from motor vehicles. The images captured will be of members of the public, Veolia employees, third party employees, motor vehicles, offenders and suspected offenders, and those entering or in the immediate vicinity of the area under surveillance. Where necessary or required, this information is shared with the data subjects themselves, employees and agents, services providers, police forces, court or tribunal, security organisations and persons making an enquiry. The operators of the system recognise the effect of such systems on the individual and the right to privacy.

Due to the location of the camera’s they may capture images of criminal activity that is unrelated to the intended purpose of the camera. When this occurs, the images or information relating to the activities seen when the images are reviewed, will be shared with the Police under the Crime and Disorder Act, “for the prevention of crime and disorder.”

Description

The system is intended to produce images as clear as possible and appropriate for the purposes stated. The system is operated to provide when required, images of evidential value, this includes of individuals and vehicles being used to fly tip at the sites. The cameras will be located at sites across Sheffield that have been identified as being at risk of removal due to complaints from either the land owner or nearby residents due to issues such as fly tipping at the site.

The camera is placed in a specially adapted bin which ensures that it and the images it has recorded are secure.

Signage is prominently placed at site when the camera is in place so those using the sites are aware that a CCTV installation is in use and includes contact details for further information.

Operation

Images captured by the system are done so based on movement, no sound is recorded. They cannot be remotely monitored. Only officers from the Council will have access to the camera while situated in the bin as the retain control of the key to
the lock. The camera is placed in its location for a number of days due to the length of time the battery lasts for the camera. It is then removed and the images reviewed. Depending on the operational need, the camera may stay at one location for a number of days or weeks before being moved to another location.

**Information retention**

When the camera is removed the images are reviewed regardless to the presence of any fly tipped material noted to be at the site when it is collected. This is because the site may have been cleaned by Veolia or a third party while the camera is in place and as such any physical evidence could have been removed.

If no evidence of fly tipping is found when the images are reviewed then all the images recorded are immediately deleted. If images are found of a fly tipping offence then these are saved and the remaining images deleted. Images saved on to the Council’s G drive will be deleted after 6 months.

Investigation files are kept for 6 years from the date of the last action and may contain copies of the images used for the investigation.

**Access**

Access to images is restricted to those who need to have access in accordance with this policy. Disclosure of recorded material will only be made to third parties in accordance with the purposes of the system and in compliance with the data protection law. Anyone who believes that they have been filmed by the system can request a copy of the recording, subject to any restrictions covered by data protection law (“Subject access request”).

Access requests should be addressed to subjectaccess@sheffield.gov.uk or Waste Management, Howden House, Union Street, Sheffield S1 1HH.

**Feedback**

Members of the public should address any concerns or complaints over the use of the Waste management CCTV system to wastemanagement@Sheffield.gov.uk or by telephone to the Waste Management Service on 0114 2037621.

**Annual review**

This policy will be reviewed annually.

Last review- January 2018

Review undertaken by Alastair Black

Next schedule review- January 2019