

# **Security estate and parking compliance document**

## **Estate and security**

### **Wembley Park Estate CCTV and Surveillance policy**

#### **Introduction**

Wembley Park Estate uses closed circuit television (CCTV) images to provide a safe and secure environment for employees, contractors, guests, residents and other visitors to the Wembley Park Estate, including its offices, retail units, residential buildings, private streets and public spaces and to protect the Company's property.

This policy sets out the use and management of the CCTV and surveillance equipment and images in compliance with the Data Protection Act 2018, GDPR and the CCTV Code of Practice.

The Company's main CCTV system records images only. There is no audio recording i.e. conversations are not recorded on CCTV however body worn cameras and mobile devices can record audio as well as images.

#### **Purposes of CCTV and Surveillance systems**

The purposes for which Wembley Park Estate has installed and uses its CCTV include:

- To assist in the prevention or detection of crime or equivalent malpractice.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the Company's business premises.
- To ensure employees and contractors comply with the Companies Health & Safety policy and procedures and that contractors comply with their Risk Assessment, Method Statements submitted prior to works being undertaken on site.
- To assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and contractors and to assist in providing relevant evidence.
- To promote productivity and efficiency.

#### **Location of cameras**

Cameras are located at strategic points throughout the Wembley Park Estate, principally at the entrance and exit points to buildings and car parks and within the private streets and public spaces. The Company has positioned the cameras so that they only cover communal or public areas on the Estate and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities, changing rooms, staff kitchen areas, staff break rooms or private offices.

All cameras (with the exception of any that may be temporarily set up for covert recording) are also clearly visible.

Appropriate signs are prominently displayed so that employees, contractors, guests, residents and other visitors are aware they are entering an area covered by CCTV.

#### **Recording and retention of images**

Images produced by the CCTV system are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing images of a high quality.

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the business dictate such as on body worn cameras.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than a 31 days period. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

Images that are stored on, or transferred on to, removable media such as CDs and mobile devices are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 31 days. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer

period.

## **Lawful basis of processing**

Where the audio or video information we collect is able to identify an individual and becomes personal data, we rely on our legitimate interest in ensuring the safety and security of individuals on the Wembley Park Estate. We carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. We keep a record of these balancing tests. You have a right to the information contained in these balancing tests on request, and can find out more by contacting us using the details in the contact us section below.

Please see our privacy policy [here](#) for more information on how we treat personal data and additional rights of individuals as relates to their personal data, including the right to lodge a complaint about the way we handle or process your information with your national data protection regulator. See details of the UK data protection regulator in the contact us section below.

## **Access to and disclosure of images**

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- Our other group companies for internal reasons where this is required in line with this policy.
- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Line managers involved with Company disciplinary and performance management processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Head of Security for Wembley Park Estate (or the Director of Operations for Wembley Park Estate acting on his behalf during absences) are the only people permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

The Head of Transport for Wembley Park Estate (or the Director of Operations for Wembley Park Estate acting on his behalf during absences) are the only people permitted to authorise disclosure of Information to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

## **Individuals' access rights**

Under the Data Protection Act 2018 and GDPR, individuals have the right on request to receive a copy of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to The Head of Security for Wembley Park Estate via [tmccormick@wembleypark.com](mailto:tmccormick@wembleypark.com). Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images. Wembley Park Estate will respond promptly and in any case within 28 calendar days of receiving the request.

The Company will always confirm the identity of anyone making a request for CCTV images before processing the request.

The Head of Security for Wembley Park Estate will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Company is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

### **Body Worn Cameras and other mobile devices**

Wembley Park Estate undertakes recording by body worn cameras and other mobile devices such as mobile phones where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take place. In all cases where images and audio are recorded, the individual employee undertaking the recording informs the employees, contractors, guests, residents and other visitors to the Wembley Park Estate individuals concerned that the recording is taking place as they are approached.

Body Worn Cameras and other mobile device monitoring may include both video and audio recording.

Body Worn Cameras and other mobile device monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, the monitoring will cease.

Information obtained through Body Worn Cameras and other mobile device monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which Wembley Park Estate cannot reasonably be expected to ignore.

### **Covert recording**

The Company will only undertake covert recording with the written authorisation of the Head of Security for Wembley Park Estate (or the Director of Operations for Wembley Park Estate acting on his behalf during absences) where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection.

Covert monitoring may include both video and audio recording.

Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.

Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Company cannot reasonably be expected to ignore.

### **Automatic number plate recognition equipment**

This equipment is located at strategic points throughout the Wembley Park Estate, principally at the entrance and exit points to car parks and within the private streets on Wembley Park Estate. The Car Parking Technology has been positioned so that they cover the private roads and car parks on the Estate and they have been positioned so that they collect and provide clear images.

Appropriate signs are prominently displayed so individuals are aware they are entering an area covered by Automatic Number Plate Recognition Equipment. Images are recorded continuously - 24 hours a day throughout the year.

### **Staff training**

Wembley Park Estate will ensure all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the Data Protection Act 2018 and GDPR with regard to that system.

### **Implementation**

The Head of Security for Wembley Park Estate is responsible for the implementation of and compliance with this policy

and the operation of the CCTV system and they will conduct a regular review of the Company's use of CCTV. Any complaints or enquiries about the operation of the Company's CCTV system should be addressed to them.

### **Contact us**

If you have any questions, comments and requests regarding this policy, please get in touch with us:

T S McCormick

Head of Security, Wembley Park

[tmccormick@wembleypark.com](mailto:tmccormick@wembleypark.com)

07917581953

5 Exhibition Way

Wembley

Middlesex

HA9 0FA

If you are not satisfied with our response to a complaint you have made, or think we aren't complying with data protection law, you can make a complaint to the UK data protection regulator - the Information Commissioner's Office:

**Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF

**Phone number:** 0303 123 1113

**Website:** <https://ico.org.uk/make-a-complaint/>

## **Wembley Park Estate Car Parking Personal Data Collection Policy**

### **Introduction**

Wembley Park Estate collects personal data to provide a safe and secure parking service on a daily and event day basis.

This policy sets out the use and management of the car parking technology in compliance with the Data Protection Act 2018, GDPR and the CCTV Code of Practice (as it applies to Automatic Number Plate Recognition equipment and the images recorded on this system).

### **Purposes of Car Parking Technology**

The purposes for which Wembley Park Estate has installed and uses its Car Parking Technology systems include:

- To facilitate the entry and egress of vehicles to the Wembley Park Estate and its car parking areas
- To allow pre booking parking spaces on an online portal
- To provide a car parking payment facility
- To ensure employees and contractors comply with the Companies Health & Safety policy and procedures and that contractors comply with their Risk Assessment, Method Statements submitted prior to works being undertaken on site.

### **Location of Car Parking Technology**

Car Parking Technology is located at strategic points throughout the Wembley Park Estate, principally at the entrance and exit points to car parks and within the private streets on Wembley Park Estate. The Company has positioned the Car Parking Technology so that they cover private roads and car parks on the Estate and they have been sited so that they provide clear images.

Appropriate signs are prominently displayed so that employees, contractors, guests, residents and other visitors are aware they are entering an area covered by Car Parking Technology.

### **Recording and retention of images**

Images produced by the Car Parking Technology system are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing images of a high quality.

Images may be recorded either in constant real-time (24 hours a day throughout the year).

As the recording system records digital images, any Car Parking Technology images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than a 31 days period. Once a hard drive has reached the end of its use, it will be erased prior to disposal.

### **Lawful basis of processing**

Where the audio or video information we collect is able to identify an individual and becomes personal data, we rely on our legitimate interest in ensuring the safety and security of individuals on the Wembley Park Estate. We carry out a 'balancing test' to ensure that our processing is necessary and that your fundamental rights of privacy are not outweighed by our legitimate interests, before we go ahead with such processing. We keep a record of these balancing tests. You have a right to the information contained in these balancing tests on request, and can find out more by contacting us using the details in the contact us section below.

Please see our privacy policy [here](#) for more information on how we treat personal data and additional rights of individuals as relates to their personal data, including the right to lodge a complaint about the way we handle or process your information with your national data protection regulator. See details of the UK data protection regulator in the contact us section below.

### **Access to and disclosure of images**

Access to, and disclosure of information held on the system is restricted. This ensures that the rights of individuals are retained. Information can only be disclosed in accordance with the purposes for which they were originally collected.

The Information is recorded centrally and held in a secure location. Access to the recorded Information is restricted to

the operators of the Car Parking Technology system and to those line managers who are authorised to view them in accordance with the purposes of the system. Viewing of Information will take place in a restricted area to which other employees will not have access when viewing is occurring. If media on which Information is recorded are removed for viewing purposes, this will be documented.

Disclosure of Information to third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- Our other group companies for internal reasons where this is required in line with this policy.
- The police and other law enforcement agencies, where the Information is recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
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The Head of Transport for Wembley Park Estate (or the Director of Operations for Wembley Park Estate acting on his behalf during absences) are the only people permitted to authorise disclosure of Information to external third parties such as law enforcement agencies.

All requests for disclosure and access to Information will be documented, including the date of the disclosure, to whom the Information have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

### **Individuals' access rights**

Under the Data Protection Act 2018 and GDPR, individuals have the right on request to receive a copy of the personal data that the Company holds about them, including Parking Technology System Information if they are recognisable from the Information.

If you wish to access any Information relating to you, you can make a written request to The Head of Transport for Wembley Park Estate via [mturner@wembleypark.com](mailto:mturner@wembleypark.com). Your request must include the date and approximate time when the Information was recorded and the location of the particular car parking technology system equipment, so that the Information can be easily located and your identity can be established as the person the Information pertains to. Wembley Park Estate will respond promptly and in any case within 28 calendar days of receiving the request.

The Company will always confirm the identity of anyone making a request for Information before processing the request.

The Head of Transport for Wembley Park Estate will first determine whether disclosure of your Information will reveal third party information as you have no right to access Information relating to other people. In this case, the Information of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If the Company is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

### **Staff training**

Wembley Park Estate will ensure all employees handling personal Information are trained in the operation and administration of the Car Parking Technology system and on the impact of the Data Protection Act 2018 and GDPR with regard to that system.

### **Implementation**

The Head of Transport for Wembley Park Estate is responsible for the implementation of and compliance with this policy and the operation of the Car Parking Technology system and they will conduct a regular review of the Company's use of Car Parking Technology. Any complaints or enquiries about the operation of the Company's Car Parking Technology system should be addressed to them.

## Contact us

If you have any questions, comments and requests regarding this Policy, please get in touch with us:

[mturner@wembleypark.com](mailto:mturner@wembleypark.com)

07917 613494

5 Exhibition Way

Wembley

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