



Privacy Notice

How we process your personal data related to our use of closed-circuit television (CCTV)

Who we are

The Independent Office for Police Conduct (“IOPC”)¹ was established to oversee the police complaints system in England and Wales and maintain public confidence in it.²

For further information on what we do, and for details about how to contact us, please visit [our website](#).

Why we process information about you

We are committed to respecting and protecting your privacy. This notice is intended to be an addendum to our other privacy notices relating to core business and human resources.

This privacy notice is to explain how and for what purpose/s we will collect and process any personal information about you in relation to our use of closed-circuit television (CCTV) situated on and around IOPC premises.

In installing and monitoring our CCTV, we have considered the Data Protection Act 2018, the UK General Data Protection Regulation (UK GDPR), the Freedom of Information Act 2000, the Protection of Freedoms Act 2012, and the Human Rights Act 1998, along with the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012.

Our CCTV may be located both outside IOPC offices and carparks, and inside entryways. It will capture images of people and vehicles in and around where the camera is located. All our cameras are fixed and there are signs displayed at each pedestrian and vehicular entrance to inform individuals that CCTV is in operation. We do not operate any covert CCTV.

¹ Formerly the Independent Police Complaints Commission. The IOPC was established on 8 January 2018.

² We also oversee the complaints system for other organisations, such as HMRC, the National Crime Agency, and the Gangmasters and Labour Abuse Authority.

Purpose of our CCTV monitoring

Our CCTV cameras are sited to support the physical security posture of the building, which can include perimeter areas, and include car parks and walkways. The principal purposes of the CCTV system are as follows:

- Prevention, reduction and detection of crime and other related incidents
- Investigation of crime and other related incidents
- To ensure the safety and protection of IOPC assets
- To monitor and maintain health, safety and wellbeing of staff and visitors
- To prevent unauthorised entry onto IOPC premises
- To assist in the investigation of suspected breaches or misconduct

The kind of personal information we collect and process

Personal data

The CCTV will capture images of people and vehicles (including potential for registration plates to be captured in an image) in and around where the camera is located. This is applicable for pedestrian and vehicular entryways in all IOPC offices where we are controllers of the data.

There are no CCTV cameras sited to purposefully capture private residential areas.

Special category data

Certain categories of personal data have additional legal protections when being processed. These categories are data about your health, racial or ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic data, biometric data, or data concerning your sex life or sexual orientation.

The placement of our CCTV which will capture images of people and vehicles may mean that we also capture some special category data, this may include, but is not limited to health information, racial or ethnic origin, and/or religious beliefs.

Criminal offence data

The processing of criminal offence data also requires additional legal safeguards. This is data which includes information about criminal allegations, criminal offences, criminal proceedings, and criminal convictions.

One of the purposes of our CCTV is the prevention, reduction, and detection of crime, to ensure the safety of the IOPC's assets. Therefore, we may during the course of our monitoring, collect information which is deemed to be criminal offence data.

Our legal basis for processing your data

The legal bases for processing your personal data are:

- the processing is necessary for the IOPC to comply with a legal obligation³
- the processing is necessary for the IOPC to perform a task in the public interest⁴
- the processing is necessary for the IOPC's legitimate interests⁵

Our legal basis for processing any special category data is:

- for reasons of substantial public interest with a basis in law, for the purpose of preventing or detecting unlawful acts⁶

Our legal basis for processing any criminal offence data is:

- the processing is necessary for the IOPC to perform a task in the public interest, for the purpose of preventing or detecting unlawful acts⁷

Who we share your data with

Where we are the controller of the images, we may need to share your information with others. We will only do this when it is necessary, or if we are required to do so by law.

We may be asked to provide the footage to assist the police with any investigations they undertake. We may also be required to share the footage with insurance companies should there be an incident.

There is no scheduled sharing of CCTV footage with any external organisation, and this will be on a case-by-case basis, by exception.

How long we will keep your data

We will retain personal data collected in accordance with the retention and disposal schedule.

Your rights in relation to the data we hold

Data protection legislation provides you with a number of rights relating to your personal data. These rights are subject to some specific exemptions. Your rights may include:

- the right to access your data
- the right to have your data corrected if it is wrong or incomplete
- the right to request restrictions to the processing of your data
- the right to object to your data being processed
- the right to have your data erased
- the right to be informed about how your data is processed
- rights relating to automated decision making and data portability

³ Article 6(1)(c) UK GDPR;

⁴ Article 6(1)(e) UK GDPR;

⁵ Article 6(1)(f) UK GDPR;

⁶ Article 9(1)(g) GDPR; s.10 and part 2 schedule 1, DPA 2018

⁷ Article 6(1)(e) GDPR; s.10 and part 2 schedule 1, DPA 2018

You should keep us informed of any changes to your information so that we can be confident that the data we hold about you is accurate. To understand more about these rights are and how to exercise them please see our web page [here](#).

Our Data Controller and Data Protection Officer

Our data controller is the Director General. The data controller has overall control over the purpose for which and the manner in which we obtain and process personal data.

We have a designated Data Protection Officer and a Freedom of Information and Data Protection Team. If you have any queries or concerns about exercising your data rights or the way in which we collect, handle or process your data, please contact the team by emailing dpo1@policeconduct.gov.uk

Alternatively, you can contact our switchboard on 0300 020 0096.

Your right to complain to the Information Commissioner

If you are unhappy with any aspect of the way in which we have processed your personal data, you have the right to make a complaint to the Information Commissioner's Office:

Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

ico.org.uk

Tel: 0303 123 1113

casework@ico.org.uk

Feedback or complaints about our service or staff

If you want to give us feedback or make a complaint about our service or staff, please [contact our Quality and Service Improvement team](#).

Review of this notice

This privacy notice will be regularly reviewed and may be revised.

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To find out more about our work or to request this report
in an alternative format, you can contact us in a number of ways:

Independent Office for Police Conduct (IOPC)
10 South Colonnade Canary Wharf London E14 4PU
Tel: **0300 020 0096**
Email: enquiries@policeconduct.gov.uk
Website: www.policeconduct.gov.uk
Text relay: **18001 020 8104 1220**

We welcome telephone calls in Welsh
Rydym yn croesawu galwadau ffôn yn y Gymraeg

[OFFICIAL]