Bereavement Services
CCTV Code of Practice

Document information

Owner	Sandwell Bereavement Services		
Status	Live	Version	2
Effective from	23 Feb 2022	Approved on	23 Feb 2022
Last updated	28 April 2026	Last updated by	Management
Review date	11 Feb 2025		
Purpose	General review of process notes		

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Document Control

Review [Date]	Reviewed by [Name]	Page [Numbers]	Comments
11 Feb 2025	Team Leader	All	General review and update of locations
4 March 2026	Team Leader and Bereavement Services Manager	All	General review of documents. Removal of Registration Services as they are covered by SMBC Facilities Management Services
17 April 2026	Team Leader and Bereavement Services Manager	1 and 6	Replacement of Surveillance Commissioner with new name of Biometrics and Surveillance Camera Commissioner
3 Sept 2026	Team Leader	8	Introduction of monitored cameras in some areas

CCTV Code of Practice

Bereavement Services manages its own CCTV operations however, CCTV systems operated by SMBC are registered with the Biometrics and Surveillance Camera Commissioner and are only used for the purposes detailed in that disclosure.

Location of CCTV

CCTV within Bereavement services is in operation at the following locations.

Location	Address	Town	Total camera count
Sandwell Valley Crematorium	Newton Road	West Bromwich	15
Reception Suite	Newton Road	West Bromwich	4
Rowley Regis Crematorium	Powke Lane	Rowley Regis	14
Fallings Heath Cemetery	Beebee Road	Wednesbury	3
Heath Lane Cemetery	Walsall Road	West Bromwich	7
Thimblemill Cemetery	Thimblemill Road	Smethwick	4
Tipton Cemetery	Alexandra Road	Tipton	3
Oldbury Cemetery	St Paus Road	Oldbury	2
Canalside Cemetery	Powke Lane	Rowley Regis	3

Use of System

CCTV is used to:

- Improve the perception of safety amongst the public.
- Assist in the detection & prevention of crime and ASB.
- Support the apprehension & prosecution of offenders in relation to crime and public order.
- Deter, discourage and reduce the incidence of crime, disorder and relevant aspects of anti- social behaviour including environmental - crime
- Assist in the management of cemeteries, crematoria in Sandwell.
- Assist in premise management and staff welfare

Data Release/Retention

All standard digital images recorded are kept for 31 days after which they will be automatically overwritten. Any request to remove evidence will only be granted by authorised personnel on provision of an appropriate request which will be documented.

Requests can only be made under the following circumstances:

- Police enquiries - for the purposes of crime investigation
- Relevant Officers of SMBC for the purpose of any investigation relating to management, anti-social behaviour or enforcement proceedings
- Any legal obligation for access under data protection legislation

The release of any digital images will be in accordance with this Code of Practice. Data integrity shall be maintained at all times.

No CCTV camera shall intentionally overlook private property or conduct directed surveillance unless as part of a specific request under RIPA and authorised by the correct officer.

Subject Access Requests (SARs)

The Data Protection Act allows for access to personal data that may have been captured and recorded by our CCTV systems. Subject to certain criteria an individual has the right to request copies of this footage via SAR application.

Any request to view CCTV footage by an individual because they believe their image was captured on CCTV can be released under the Data Protection Act.

To respond to a SAR we need:

- photographic identification – either driving licence or passport.
- If these cannot be provided we will accept confirmation of address – bank statement/utility bill along with an up to date photograph so that we can confirm identity

The right to know is necessary as to exactly why someone requires the footage as it may qualify as an exemption under the Data Protection Act and be exempt from disclosure.

Specifics are therefore necessary as to why an individual has requested the information. If when recovering and editing the data, it is not possible to blank out other third-party images then a request may be refused.

Crime

If an individual believes that a crime has been committed and has been captured on CCTV we will request they contact the police and report the incident. Access to the data can then be secured and shown to the police once the crime has been reported.

An individual cannot request information about someone other than themselves. In these circumstances, there is a duty of confidence to any third parties who may also be on the footage.

Application for Access

Applications for data subject access should be made in writing to:

Bereavement Services Manager,
Sandwell Valley Crematorium,
Newton Road,
West Bromwich,
B71 3SX

Declined Access Requests

If a request is denied, individuals may refer their request to:

The Biometrics and Surveillance Camera Commissioner's Office,
2 Marsham Street,
1st Floor,
Peel,
London,
SW1P 4DF
enquiries@obscc.org.uk

Responsibilities for those with access to CCTV within Bereavement Services

Those with access to CCTV system have prime responsibility for:

- Compliance with the purpose and objectives of systems
- Operation and security of systems
- The protection of the interests of the public and of the individual as far as is reasonably practical
- Compliance with this Code of Practice

Operational Standards

Access to CCTV images is managed by Bereavement Services employees who are directly employed by Sandwell on a permanent capacity.

Access to CCTV systems will be limited to the following Bereavement Services employees:

Location	Address	Town	Employee Access
Sandwell Valley Crematorium	Newton Road	West Bromwich	Bereavement Services Senior Management Team
Reception Suite	Newton Road	West Bromwich	Bereavement Services Senior Management Team
Rowley Regis Crematorium	Powke Lane	Rowley Regis	Bereavement Services Senior Management Team
Fallings Heath Cemetery	Beebee Road	Wednesbury	Bereavement Services Senior Management Team
Heath Lane Cemetery	Walsall Road	West Bromwich	Bereavement Services Senior

			Management Team
Thimblemill Cemetery	Thimblemill Road	Smethwick	Bereavement Services Senior Management Team
Tipton Cemetery	Alexandra Road	Tipton	Bereavement Services Senior Management Team
Oldbury Cemetery	St Pauls Road	Oldbury	Bereavement Services Senior Management Team
Canalside Cemetery	Powke Lane	Rowley Regis	Bereavement Services Senior Management Team

Most systems in operation are not routinely monitored however images are recorded 24 hours each day, 365 days of the year. In some instances, our cameras are connected to an alarm receiving centre and are viewed live when an alarm is triggered to ensure appropriate action is taken. A responsive maintenance contract is in place that ensures CCTV related faults can be remedied in a timely manner.

A username and password are required to remove footage in a usable format. All data removed from the system is recorded in operational logs, allowing audit processes to be carried out.

Laws Relating to CCTV

There are several pieces of legislation governing the use of CCTV, some of these and how they impact CCTV users are listed below.

The **Data Protection Act 2018** (DPA) is an act of Parliament which governs the protection of personal data in the UK. The Act defines data protection principles that could affect the use of CCTV and takes account of GDPR.

The **General Data Protection Regulation** (GDPR) is a regulation in EU law on data protection and privacy for all individuals within the European

Union. It addresses the export of personal data outside the EU and aims primarily to give control to citizens and residents over their personal data. These regulations affect and guide the processes for retaining and using CCTV footage.

The **Human Rights Act 1998** is an act of Parliament that makes it unlawful for any public body to act in a way which is incompatible with the Convention. In relation to CCTV, Article 8 of the European Convention on Human Rights is relevant as it provides a right to respect for one's "private and family life.

The **Regulation of Investigatory Powers Act 2000** (RIP or RIPA) regulates the powers of public bodies to carry out surveillance and investigation. RIPA can be invoked by government officials specified in the Act on the grounds of national security, and for the purposes of preventing or detecting crime, preventing disorder, public safety, protecting public health, or in the interests of the economic well-being of the United Kingdom.

The **Protection of Freedoms Act 2012** was designed primarily to protect people in England and Wales "from unwarranted state intrusion in their private lives". The act covers various issues but in relation to CCTV introduces regulation that lays down a **Code of Practice by the Surveillance.**

As a result of these requirements only council owned CCTV is permitted on any cemetery or crematorium site.