Little Downham Parish Council

CCTV Policy

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1.Purpose

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) within the 'Parish of Little Downham'. A CCTV system is installed externally at "The recreation & Playground area" for the purpose of enhancing the security of the area and its associated equipment. The CCTV is in continual operation and is intended for the purposes of:

- Protecting Parish Council buildings and assets
- Promoting the health and safety of parishioners and visitors
- Preventing bullying and/or intimidation by individuals and/or groups
- To reduce crime and anti-social behaviour
- Supporting the police in a bid to deter and detect crime
- Assisting in identifying, apprehending and prosecuting offenders
- The CCTV system is owned and operated by the Parish Council personnel
- The introduction of, or changes to, CCTV monitoring will be subject consultation with members of the Parish Council

The Little Downham Parish Council's CCTV is registered with the Information Commissioner Office (ICO) and we pay an annual fee under the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679.

2. Scope

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The Parish Council complies with the Information

Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be prominently placed in areas where CCTV is used, with contact details of the Little Downham Parish council.

The placement of the cameras endeavours to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage. Video monitoring of public areas for security purposes within the Parish Council is limited to uses that do not violate the individual's reasonable expectation to privacy.

All CCTV systems and associated equipment will be required to comply with this policy following its adoption by the Parish Council. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018.

3. Location of Cameras

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed and care will be taken to ensure that reasonable privacy expectations are not violated. The Parish Council will ensure that the location of future equipment is carefully considered to ensure that the images captured comply with the legislation.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- *Protection of buildings and property: Vandalism, theft*
- *Criminal Investigations (carried out by the police)*: Robbery, burglary and theft surveillance

4. Storage and retention of CCTV images

Recorded data will not be retained for longer than 30 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention beyond the standard 3o hours days will reflect the Parish Council's specific purposes for recording information, and how long it is needed to achieve these purposes.

The Parish Council will store data securely at all times.

5. Access to CCTV images

Access to recorded images will be restricted to authorised personnel only. In line with Data Protection, the CCTV is located in a secured cabinet and on mobile apps with no access to non-authorised persons. To protect all parties, two authorised people are required to view any CCTV recordings or carry out searches at all times. Supervising the access to and maintenance of the CCTV System is the responsibility of the Parish Council. In view of this, it is paramount that the Parish Council has three parish councillors trained on the CCTV system at all times.

6. Access Requests

6.1 Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.

6.2 All requests should be made to the Parish Clerk.

Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

6.3 The Parish Council does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if it is deemed necessary and it meets certain criteria.

6.4 The Parish Council will endeavour to respond to requests within one calendar month of receiving the request.

6.5 The Parish Council reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7. Access and disclosure of images to third parties

7.1 There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police. (e.g. investigators).

7.2 If there are any concerns as to disclosure, then the Parish Council should seek expert advice from a Data Protection Officer in the first instance and appropriate legal advice as required.

8. Responsibilities

The Parish Council retains overall responsibility and will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the Parish.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g. an access log) to or the release of any material recorded or stored in the system.
- Ensure that the perimeter of view from cameras conforms to this policy.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the Parish Council and be mindful that no such infringement is likely to take place.
- Ensure that cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and for no other purpose.
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas.

9. Data protection impact assessments and privacy by design.

CCTV has the potential to be privacy intrusive. The Parish Council will perform a privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary. An annual servicing of the system to ensure everything is fully functioning should be carried out by qualified personnel only.

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10. Policy Review

The Clerk and Responsible Officer are responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

CCTV SIGNAGE

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The Parish Council is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded.
- The purposes of using CCTV.
- The name of the Parish Council.
- The contact telephone number or email address for enquiries.

Policy Adopted	Policy Reviewed	Next Review
June 2024	12th May 2025	May 2026