



CLOSED CIRCUIT TELEVISION POLICY

Title	CCTV Policy
Owner	Chair
Version umber	1.0
Primary audience	General public, councillors, and staff
Document location	Shared drive
Objective	To set out the Parish Council's position on its use of CCTV

1.0 Background

- 1.1 Stoke Mandeville Parish Council uses Closed Circuit Television (CCTV) and its images for the prevention, identification, and reduction of crime and to monitor the Community Centre and the Playing Field, including the play area, to provide a safe and secure environment for all Parish Council members, Parish Council employees and users of the playing field and its facilities.
- 1.2 CCTV Surveillance at the Playing Field is intended for the purpose of:
- Protecting the Parish Council owned community centre, facilities, and grounds (its assets) 24 hours a day, 7 days a week.
 - Promoting the health and safety of staff, members, and users.
 - Reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
 - Supporting the Police in a bid to deter and detect crime.
 - Assisting in identifying, apprehending, and prosecuting offenders and ensuring that all rules pertaining to the use of the community centre, and grounds are respected and can be managed properly.
- 1.3 The system comprises of 18 cameras, 17 of which cover the exterior of the community centre, playing field, play area, and tennis courts with 1 covering the inside of the lobby area of the community centre.
- 1.4 The CCTV system is owned and operated by Stoke Mandeville Parish Council and the deployment of which, is determined by the Parish Clerk/RFO as Data Controller and subsequently Full Council.
- 1.5 The CCTV is monitored centrally from the Parish Office by the Parish Clerk.
- 1.6 The Parish Council's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the Parish Council's use and how

it complies with the Act.

- 1.7 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to and disclosure of recorded images.
- 1.8 The Parish Council complies with the Information Commissioner's Office (ICO) Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 1.9 The use of CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes are prohibited by this policy, e.g. it will not be used to monitor employee performance.
- 1.10 Monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by Parish Council, including Code of Conduct and other relevant policies.

2.0 Justification for Use of CCTV

- 2.1 The use of CCTV to control the Playing Field for security purposes, has been agreed by Full Council. The system is intended to capture images of intruders or of individuals damaging Parish Council owned property, or removing equipment without authorisation, or anti-social behaviour.
- 2.2 CCTV Systems will not be used to monitor sporting events/activities or employees at work.

3.0 Data Protection Impact Assessment

- 3.1 Where new CCTV systems or cameras are to be installed, the Parish Council will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve consultation with residents / neighbouring properties.

4.0 Location of Cameras

- 4.1 Stoke Mandeville Parish Council has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. The cameras will be sited so they can only capture images relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectation are not violated. See Appendix 2
- 4.2 The Parish Council will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The Parish Council will make every effort to position cameras so that their coverage is restricted to the Playing Field areas.
- 4.3 CCTV video monitoring and recording of public areas may include:
 - **Protection of Parish Council buildings and property;** All buildings and property on Stoke Mandeville Parish Council owned land
 - **Criminal Investigations (carried out by Police):** Robbery, burglary, and theft surveillance as well as anti-social behaviour.

5.0 Covert Surveillance

5.1 Stoke Mandeville Parish Council will not engage in covert surveillance.

6.0 Notification

6.1 A printed copy of this CCTV policy is available on request and is also available free of charge to download from the Parish Council website.

6.2 The location of the cameras will also be indicated via a plan, available to view on the Parish Council website.

6.3 Adequate signage is placed on the Playing Fields buildings, to indicate that CCTV is in operation.

7.0 Storage and Retention of Images/Data

7.1 The images/data captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

7.2 The images/recordings will be stored in a secure environment with a log of access kept.

7.3 Access will be restricted to authorised personnel only. Supervising the access and maintenance of the CCTV system is the responsibility of the Parish Clerk, who may delegate the administration of the CCTV system to the Assistant to the Parish Clerk.

7.4 In certain circumstances, the recordings may also be viewed by other individuals to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

8.0 Access

8.1 Recorded footage and the recording equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.

8.2 Access to the CCTV system and stored images will be restricted to authorised personnel only (Parish Clerk and Assistant).

8.3 When accessing stored images two authorised members of staff must be present (Parish Clerk and Assistant). A written record of access will be made. Records of access will be kept.

8.4 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

8.5 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

8.6 In relevant circumstances, CCTV footage may be accessed:

- by the police where Stoke Mandeville Parish Council are required by law to make a report regarding the commission of a suspected crime; or
- following a request by the Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Stoke Mandeville Parish Council property, or

- to the HSE and/or any other statutory body charged with child safeguarding; or
- to assist the Parish Clerk in establishing facts in cases of unacceptable behaviour, in which case, the individuals involved, will be informed; or
- to data subjects (or their legal representatives), pursuant to a Subject Access Request or
- to individuals (or their legal representatives) subject to a court order.
- to the Parish Council insurance company where the insurance company requires same to pursue a claim for damage done to the insured property.

9.0 Subject Access Requests (SAR)

- 9.1 Individuals have the right, subject to section 7.1, to request access to CCTV footage relating to themselves under the Data Protection Act.
- 9.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time, and location.
- 9.3 The Parish Council will respond to requests within 30 calendar days of receiving the request in line with the Parish Council's right of access policy.
- 9.4 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.
- 9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.
- 9.6 In giving a person a copy of their data, the Parish Council will provide a still or series of pictures on encrypted matter. However, images of other individuals will be obscured before the data is released.
- 9.7 Where footage contains images relating to 3rd parties, the Parish Council will take appropriate steps to mask and protect the identities of those individuals.

10.0 Complaints

- 10.1 Complaints and enquiries about the operation of CCTV within the Playing Field should be directed to the Parish Clerk in the first instance.
- 10.2 If the complaint is against the Parish Clerk, then the complaint should be directed to the Chair of the Parish Council.

11.0 Staff Training

- 11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.
- 11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.
- 11.3 Staff misuse of surveillance system information will lead to disciplinary proceedings.