

CCTV Policy

1.0 Background

Naseby Parish Council uses Closed Circuit Television (CCTV) and its images for the prevention, identification, and reduction of crime and to monitor the playing field, play area and Village Hall facilities on Haslebech Road, in order to provide a safe and secure environment for all council members, council employees and users of the sports pavilion and grounds.

1.2 CCTV Surveillance at the Haselbech Road site is intended for the purpose of:

- Protecting the Council owned sports pavilion, 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 sport pavilion and grounds are respected and can be managed properly.

1.3 The system comprises of 5 fixed cameras, which cover the playing field, play area and the Village Hall entrance and car park.

1.4 The CCTV system is owned and operated by Naseby Parish Council and the deployment of which, is determined by the Clerk/RFO as Data Controller and subsequently full council.

1.5 The CCTV is monitored centrally from the Village Hall by three of the Data Controller's;
- Parish Clerk – Josie Flavell
- Councillor Rachael Johnson
- Councillor Antonia Collins

1.6 The Council's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the 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 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 members of the public without just cause.

1.10 Monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by Council, including Dignity at Work Policy, Code of Conduct, Bullying & Harassment and other relevant policies.

2.0 Justification for Use of CCTV

- 2.1 The use of CCTV to control the perimeter of the Village Hall grounds for security purposes, has been deemed to be justified by full Council. The system is intended to capture images of intruders or of individuals damaging 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

- 3.0 Where new CCTV systems or cameras are to be installed, 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 local residents/neighbouring properties.

4.0 Location of Cameras

- 4.0 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 expectations are not violated.
- 4.1 Council will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. Council will make every effort to position cameras so that their coverage is restricted to the sports pavilion and its grounds.
- 4.2 CCTV will not be used inside the Village Hall.
- 4.3 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Naseby Parish Council has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals, with cameras in external areas being positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.
- 4.4 CCTV video monitoring and recording of public areas may include:
- **Protection of council buildings and property;** The sports pavilion perimeter, entrances and exits, storage areas, car park and main gates.
 - **Monitoring of access control systems:** Monitor and records restricted access areas at entrances to the sports building and other areas;
 - **Criminal Investigations (carried out by Police):** Robbery, burglary and theft surveillance as well as anti-social behaviour.

5.0 Covert Surveillance

- 5.0 Naseby Parish Council will not engage in covert surveillance.

6.0 Notification

- 6.0 A copy of this CCTV policy is available on request and is also available free of charge to download from the Parish Council website.
- 6.1 The location of the cameras will also be indicated via a plan, with adequate signage placed on and around the grounds of the Village Hall, to indicate that CCTV is in operation.

7.0 Storage and Retention of Images/Data

- 7.0 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.
- 7.1 The images/recordings will be stored in a secure environment with a log of access kept.
- 7.2 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 another Data Controller.

7.3 In certain circumstances, the recordings may also be viewed by other individuals in order 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

8.0 Recorded footage and the monitoring 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.

8.1 Access to the CCTV system and stored images will be restricted to authorised personnel only (Parish Clerk and Councillor Data Controllers).

8.2 When accessing images two Data Controllers (Parish Clerk and Councillor) must be present. A written record of access will be made. Records of access will be kept.

8.3 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.

8.4 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.

8.5 In relevant circumstances, CCTV footage may be accessed:

- By the Police where Naseby 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 Naseby 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 in order to pursue a claim for damage done to the insured property.

9.0 Subject Access Requests (SAR)

9.0 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

9.1 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.

9.2 Council will respond to requests within 30 calendar days of receiving the request in line with the council's right of access policy.

9.3 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.

9.4 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.

9.5 In giving a person a copy of their data, Council will provide a still or series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.

9.6 Where footage contains images relating to 3rd parties, Council will take appropriate steps to mask and protect the identities of those individuals.

10.0 Complaints

10.0 Complaints and enquiries about the operation of CCTV within the school should be directed to the Parish Clerk in the first instance.

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.

12.0 Responsibilities

12.0 The Parish Clerk will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Naseby Parish Council.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes.
- 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 tapes or any material recorded or stored in the system
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to members of the public and council staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the setting and be mindful that no such infringement is likely to take place
- Co-operate with the Parish Clerk in reporting on the CCTV system in operation.
- Ensure that external 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 monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- 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 not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

