



Middleton Cheney Parish Council

Category: Policy	Status: Adopted
Responsible: Clerk/RFO	Adoption minute ref: 23/241
Applicable to: Finance & Policy Committee	Adoption date: 18/09/2023
Version: 1.0	Next review:

CCTV Policy & Procedure

Introduction

The Council is required to adhere to the General Data Protection Regulations, with respect to all information or data held about visitors to the Parish Meeting Room and Play Areas including any data captured on CCTV.

The purpose of this policy is to regulate the management, operation, and use of CCTV systems.

The Policy is intended to ensure that the Parish Council operates the CCTV system in compliance with GDPR, Code of Practice and other relevant legislation.

Purpose of the CCTV System

The Parish Council has installed the CCTV system to:

- Deter crime.
- Increase personal safety and reduce the fear of crime.
- Assist in the prevention and detection of crime.
- Assist with the potential investigation and identification of offenders.
- As a means of assistance to staff in case of emergency situations.

The camera locations are determined by risk assessments - High, Medium, Low-level risk - with the assistance of historical data and incident reports.

The CCTV cameras are owned by the Council, who have overall responsibility for the CCTV systems. The Clerk is responsible for the system's day-to-day operation.

The servers which support the cameras and record the images captured are kept securely. The Council understands that all systems, information, documents, and recordings obtained and used as data is protected by GDPR. The viewing and copying of the images will be strictly controlled.

The images captured by the cameras are recorded continuously. The images can be viewed when there has been a specific event and in line with appropriate guidance.

Design and Operation of the System

The cameras have been directed where they will not focus on private homes, gardens, and other areas of private property. Positioning is checked on a regular basis to ensure that they have not moved, and this will be recorded in the CCTV Operating File.

Warning signs have been placed in an external area where CCTV is operational.

The sign locations and content are compliant with the Information Commissioners Code of Practice.

Viewing and Storing of Images

The following members of staff are authorised to view images captured by the CCTV system:

- Clerk/RFO
- Data Protection Officer
- HR Committee Chair
- Chair of Council
- External CCTV providers (engineers for the purpose of maintenance)
- Any other staff as required to assist in the identification following an incident.
- Temporary staff are not permitted.

Other than detailed above, images captured by the system will only be shared with law enforcement agencies where a crime needs to be investigated. Any other requests for images would be refused, except in very limited circumstances where it may be appropriate to release images to a third party. In such cases the agreement of the Data Protection Officer must be sought before this information is released.

When images are provided to any external body, including the Police, this will be done by downloading the information on to a memory stick. The following information will be recorded in the CCTV Operating File for every memory stick produced:

- The date and time the information was provided to the external body.
- The details of the person to whom the information has been provided, including their employing organisation and contact details.
- The date and time covered by the images on the Memory stick and the camera on which they had been captured.
- The name of the person and their job title transferring the images onto the Memory stick.

Information stored on the system constitutes personal data as defined by GDPR. An individual may ask to see images of themselves via a Subject Access Request.

There will be no disclosure of recorded data to third parties other than the authorised organisations such as the Police and others given permission by the Data Protection Officer for a specific purpose, for example other investigations.

Retention

Images recorded by the system will not be kept any longer than is necessary and for a maximum of 2 months except in circumstances such as where a law enforcement body is investigating a crime, the footage is required for insurance purposes or as part of an ongoing investigation. In such cases these images will be downloaded onto a disc and secured in a safe place in the Parish Council Office. A record will be kept in the CCTV Operating File of any images kept after the 2-month time period and the reason for this.

Maintenance of the System

The Clerk will check and confirm the efficiency of the system. In particular this will ensure that the equipment is recording properly, the cameras are functional, image quality is suitable for the purpose for which it is intended and the date and time stamp on the image is accurate. These checks will be recorded in the CCTV Operating File. Any faults will be reported immediately.

Any maintenance, planned or unplanned, will be recorded in the CCTV Operating File as will any alterations/additions to the CCTV system. In the event that the CCTV system is altered for example if further cameras are added, this policy will be reviewed to ensure it is still fit for purpose.

Breaches of the Code

Any breach of this policy by staff will be investigated initially by the Clerk and may be dealt with under the disciplinary procedure.

Any complaints about the operation of the CCTV system should be addressed to the Clerk and dealt with under the Parish Council's complaints procedure.

Staff Guidance and Training

All staff are made aware of the CCTV Policy and will be able to access a copy via the Website.

Staff authorised to operate the system and view images will be provided with guidance and training on their obligations under this Policy. Staff will be asked to confirm their understanding of the Policy and the requirements of GDPR.

Review of the Policy

The Policy will be subject to regular review or where there are any alterations/additions to the system as specified. The review will be in consultation with relevant parties.

Document History

Version	Author	Date	Changes	Status	Minute ref
1.0	Alan Youel	23-04-2022		Draft	
1.1	Alan Youel	07.08.2023	Update	Draft	