

CCTV POLICY

1. Objectives and targets

This CCTV Policy explains how Parbold Parish Council will operate its CCTV equipment and comply with the current legislation.

Parbold Parish Council uses CCTV equipment to provide a safer, more secure environment for its staff, volunteers and service users and to combat vandalism and theft. Essentially it is used for:-

- The prevention, investigation and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Safeguarding public, volunteers and staff.
- Monitoring the security of the site.
- To protect members of the public and private property.

CCTV has been accepted because all other options have been found to be ineffective. Improved lighting has been installed, locking of the play area gate is not permitted as this is a fire escape route identified by the Fire Officer. A log of anti-social behaviour, nuisance for neighbours on Greenfield Avenue, a hit and run car causing £27,000 damage to the frontage of the hall and an abandoned vehicle on the car park illustrate the reasons this decision has been taken.

Parbold Parish Council does not use the CCTV system for covert monitoring.

2. Location

Cameras are located in those areas where it has been identified there is a need and where other solutions are ineffective. The CCTV system is used solely for purpose(s) identified and is not used to routinely monitor staff, volunteers or service users' conduct. Cameras will not be used in areas subject to a heightened expectation of privacy e.g. changing rooms or toilets. Signage alerts individuals to the use of CCTV on entrance to the Village Hall.

Static cameras will not focus on private homes, gardens and other areas of private property.

Materials or knowledge secured as a result for CCTV will not be used for any commercial purpose.

3. Maintenance

The CCTV is maintained by Parbold Parish Council and includes periodic maintenance inspections

Parbold Parish Council is responsible for:-

- Ensuring that it complies with the its responsibilities in relation to the guidance on the location of the camera.
- Ensuring that the date and time reference are accurate.
- Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.

4. Identification

In areas of the entrance to the Village Hall, car park and play area, the Council will ensure prominent signs are in place

The signs will

- Be clearly visible and legible.
- Contain the details of the installation company operating the system.
- Be an appropriate size depending on context.

5. Type of equipment

Parbold Parish Council's standard CCTV cameras record visual images only and do not record sound.

6. Administration:-

Parbold Parish Council is the Data Controller and the Data Protection Officer has responsibility for the control of images and deciding how the CCTV system is used. The Council has notified the Information Commissioner's Office of both the name of the Data Controller and the purpose for which the images are used.

Only the Data Protection Officer will have access to images and is aware of the procedures that need to be followed when accessing the recorded images. The Data Protection Officer is trained and is aware of responsibilities under the CCTV

Code of Practice: <https://ico.org.uk/for-organisations/guide-to-dataprotection/encryption/scenarios/cctv/>

Access to recorded images is restricted to the Data Protection Officer and recordings will be accessed as prescribed by the Council in the event of an incident.

Access to the medium on which the images are recorded is documented. All employees are aware of the restrictions in relation to access and security, and disclosure of, recorded images.

Image storage, viewing and retention

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified.

Parbold Parish Council reserves the right to use images captured on CCTV where there is activity that cannot be expected to be ignored such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. The Data Protection Officer will retain images for evidential purposes in a locked area. Where images are retained, the Data Protection Officer will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.

Parbold Parish Council ensures that images are not retained for longer than is necessary. Once the retention period has expired, images are removed or erased.

Disclosure

Disclosure of the recorded images to third parties can only be authorised by the Data Controller.

Disclosure will only be granted:

- If its release is fair to all individuals concerned.
- If there is an overriding legal obligation (e.g. information access rights).
- If it is consistent with the purpose for which the system was established.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented.

N.B Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

Subject Access Requests

Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If Parbold Parish Council receives a Subject Access Request under the General Data Protection Regulations 2018 it will comply with requests within 1 month. The Council may charge a fee for the provision of a copy of images. If the Council receives a request under the Freedom of Information Act 2000 it will comply with requests within 20 working days of receiving the request.

As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request.

Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system. Requests for access should be addressed to the Data Controller.

Refusal to disclose images may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to that individual.
- To prevent automated decisions from being taken in relation to that individual.

Monitoring and evaluation

Parbold Parish Council undertakes regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:

- Its stated purpose.
- The location.
- The images recorded.

- Storage length.
- Deletion.

Period of Review

The efficacy of this Policy will be reviewed bi-annually by Parbold Parish Council. If the Council decides to change the way in which it uses CCTV, it will inform the Information Commissioner within 28 days.

Guiding Principles System operators should adopt the following guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

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| Data Controller: | Parbold Parish Council |
| ICO Registration: | Z1333833 |
| Data Protection Officer | Mrs Elizabeth-Anne Broad, Clerk to the Parish Council |
| | 1 Pinewood, Skelmersdale, Lancashire, WN8 6UZ |