



West End Parish Council

CCTV Policy

Purpose

CCTV systems are installed (both internally and externally) in Council owned premises to provide a safer, more secure environment for its staff, volunteers, and service users and to combat vandalism and theft. CCTV surveillance at West End Parish Council is intended for the purposes of:

- Protecting Parish Council buildings and assets, both during and after working hours;
- Promoting the health and safety of staff and visitors
- 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 the Parish Council rules are respected so that the Parish Council can be properly managed.

The system does not have sound recording capability.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with members of the Parish Council.

Video monitoring of public areas for security purposes within Parish Council premises 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 be compliant with this policy following its adoption by West End 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

All authorised operators with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities in following the CCTV Code of Practice. All members are aware of the restrictions in relation to access to, and disclosure of recorded images.

Guiding Principles

In accordance with the Surveillance Camera Code of Practice 2021, West End Parish Council has adopted the following 12 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 user 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.



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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.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

Location of Cameras

Closed circuit television (CCTV) is installed at the Parish Centre inc. Workshop, Townhill Farm Community Centre, the YoutHouse and Cutbush Football Pavilion.

The Parish Council will ensure that the location of equipment is carefully considered to ensure that the images captured comply with legislation. West End Parish Council will make every effort to position the cameras so that their coverage is restricted to Parish Council premises, which includes both indoor and outdoor areas.

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

- **Protection of buildings and property:**
The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services.
- **Monitoring of Access Control Systems:**
Monitor and record restricted access areas at entrances to buildings and other areas.



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- **Verification of Security Alarms:**
Intrusion alarms, exit door controls, external alarms.
- **Video Patrol of Public Areas:**
Parking areas, Main entrance/exit gates, Traffic Control
- **Criminal Investigations (carried out by the police):**
Robbery, burglary, and theft surveillance

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 Parish Council will store data securely at all times.

Access to CCTV Images

Access to recorded images will be restricted to authorised personnel to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Parish Council. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

Subject Access Requests (SAR)

- 7.1 Individuals have the right to request CCTV footage relating to themselves under the General Data Protection Regulation and Data Protection Act 2018
- 7.2 All requests should be made in writing to the Parish Clerk who can be contacted by email on clerk@westend-pc.gov.uk 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.
- 7.3 The Parish Council does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available.
- 7.4 The Parish Council will respond to requests within one calendar month of receiving the request in compliance with GDPR.
- 7.5 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.

Access and Disclosure of Images to Third Parties

- 8.1 There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police where they would reasonably need access to the data.



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- 8.2 If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. 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 may be required.
- 8.3 The data may be used within the Parish Council's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

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 Council premises.
- 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.
- Maintain an access log to document the release of any recorded material stored in the system.
- 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 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 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) or other bona fide use as approved by Parish Council members.

Complaints

Complaints must be in writing and addressed to the Parish Clerk. Where the complainant is a third party, and the complaint or enquiry relates to someone else, the written consent of the data subject to engage in correspondence is required. All complaints will be acknowledged within seven days, and a written response issued within 21 days.

Policy Review

The Parish Clerk is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews. The policy will be reviewed by the Policy & Resources committee every two years.