

# Rodney Stoke Parish Council

## CCTV Policy

1. **Introduction** Rodney Stoke Parish Council uses closed circuit television (CCTV) images to reduce crime and anti-social behaviour, in order to provide a safe and secure environment for members of the public and to prevent the loss or damage to property. The CCTV systems and the images produced are controlled by the Parish Clerk who is responsible for how the systems are used. The use of CCTV and the associated images is covered by data protection law and the General Data Protection Regulations (GDPR). The Parish Council is registered with the Information Commissioner's Office (ICO) and the use of CCTV is covered by this registration.
2. **This policy** outlines the Parish Council's use of CCTV and how it complies with data protection legislation. The Parish Council has considered the need for using CCTV and has decided that it is required for the reasons stated above. In accordance with ICO guidance, a Data Protection Impact Assessment (DPIA) has been created to explain the Parish Council's decision to use CCTV and sets out an assessment of how it will impact people's privacy (see Appendix).

The Parish Council conducts an annual review of its CCTV policy.

3. **Siting Of Cameras** In areas where CCTV is used, the Parish Council will ensure that there are prominent signs placed within the controlled area. It is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage. Cameras will be sited so they 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. The Parish Council will ensure that the location of equipment is carefully considered to ensure that images captured comply with the data protection legislation.
4. **Storage and Retention of CCTV images** Recorded data will be retained for no longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All data will be held on a secure hard drive not connected to any outside source, for up to 14 days for the 4 camera set-up. The CCTV storage device is held in a locked cabinet at the Memorial Hall, Draycott, in a locked first-floor room and is accessible to authorised personnel only.
5. **Access to CCTV images** Access to recorded images will be restricted to those personnel authorised to view them. Access shall be by 2 authorised persons. Being where possible any combination of the Clerk to the Council; the Chairman or the Vice Chairman. An appropriate Councillor may be nominated if strictly necessary. Access will not be made more widely available. Images will not be monitored. Data will only be accessed in relation to a Subject Access Request or in response to a crime investigation. Should data need to be transferred,

this will be done via password protected USB drive or such secure media as requested by the police.

6. **Subject Access Requests (SAR)** Individuals have the right to request access to CCTV footage relating to themselves under data protection legislation. 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. The Parish Council will respond to SARs in accordance with its Data Protection Policy but may offer an option to view the identified footage. In line with ICO guidance, a reasonable fee (up to £25) may be charged for administrative costs, if a request is found to be manifestly unfounded or excessive, or if an individual requests further copies of their data.

The Parish Council reserves the right to:

- refuse access to CCTV footage or
  - refuse a request to delete CCTV footage
- where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7. **Access and Disclosure of Images to Third Party Organisations** There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the Parish Council where these would reasonably need access to the data (e.g. investigators). Requests by Third Party Organisation should be made in writing to the Parish Clerk. Disclosure to any third-party organisation must be approved by 3 Councillors, where possible including the Chairman and Vice Chairman.

8. **Complaints** Complaints and enquiries about the operation of CCTV within the Parish Council should be directed in writing to the Parish Clerk in the first instance. Parish Clerk: H Marshall 3 Barrows Park Cheddar Somerset BS27 3AZ Telephone: 074232 83940 Email: rodneystokepc@gmail.com

Or the Information Commissioner's Office - helpline 0303 123 1113 or website: <https://ico.org.uk/make-a-complaint/> CCTV Policy

This Council adopted this policy at its Council meeting on 16<sup>th</sup> September 2021

#### Appendix 1 - Details of the Current System

##### Data storage

Location	Equipment	Data Storage	Recording capability
Draycott Playing Field, Driveway, Car Park, Children's Play Area	4 cameras	Up to 14 days before automatic deletion	Video

## Appendix 2 Data Protection Impact Assessment