



Highley Parish Council CCTV Policy August 2023

1. Policy Summary:

1.1 Highley Parish Council has in place Closed-Circuit television (CCTV) and Automatic Number Plate Recognition (ANPR) cameras. This policy details the purpose, use and management of the systems, and details and procedures to be followed in order to ensure HPC complies with relevant legislation and Codes of Practice where necessary.

1.2 This policy and the procedures therein detailed, applies to all of HPC's CCTV and surveillance systems, capturing images of identifiable individuals for the purpose of viewing and/or recording the activities of such individuals and property.

1.3 CCTV and surveillance system images are monitored and recorded in strict accordance with this policy.

2. Introduction:

2.1 The Council uses CCTV and surveillance system images for the prevention and detection of crime and public safety, to monitor the Council property in order to provide a safe and secure environment for staff, volunteers, contractors, visitors and members of the public, and to prevent the loss of or damage to persons or property.

2.2 The CCTV and surveillance systems within Highley village are owned by the Council and managed by the Council, the Police and/or its appointed agents. The Council is the system operator and data controller for the images produced by the CCTV and surveillance systems and is registered with the Information Commissioners Office (ICO) Registration Number: ZA267339

2.3 This policy applies to CCTV and other surveillance systems that view or record individuals and covers other information that relates to individuals, for example vehicle registration marks captured by ANPR equipment.

3. Purpose:

3.1 This policy governs the installation and operation of all CCTV and surveillance systems owned by the Council.

3.2 CCTV surveillance is used to monitor and collect visual images for the purpose of:

3.2.1 help reduce fear of crime and provide a safe environment for residents and visitors to the areas covered by the scheme.

3.2.2 help deter and detect crime and provide evidential material for court proceedings.

3.2.3 assist in overall management of the Council.

3.2.4 enhance community safety including prevention and detection of harassment and assist in developing economic well-being of the Parish area.

3.2.5 assist local authority in enforcement and regulatory functions.

3.2.6 assist in traffic management and encourage safer and more sustainable use of all modes of transport and provide travel information if required.

3.2.7 assist in supporting civil proceedings.

3.2.8 monitor all modes of travel enabling improvement and better management of the public highways within the Parish.

4. Scope:

4.1 This policy applies to all CCTV and related CCTV systems operated by the Council.

4.2 Where a system is jointly owned or jointly operated, the governance and accountability arrangements are agreed between the partners and documented so that each partner organisation has clear responsibilities with clarity over obligations and expectations and procedures for the resolution of any differences between the parties or change of circumstances.

4.3 This policy is applicable to and must be followed by all staff including consultants, contractors and the Police. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to volunteers and Council members.

4.4 All Council members will be made aware of this policy and will only be authorised to use the CCTV system in a way that is consistent with the purposes and procedures contained therein.

4.5 All system users with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will have relevant skills and training on the operational, technical and privacy considerations and fully understand the policies and procedures.

5. Policy Statement:

5.1 The Council will operate the CCTV systems in a manner that is consistent with respect for the individual's privacy.

5.2 The Council complies with the Information Commissioners Office (ICO) CCTV Code of Practice

<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/guidance-on-video-surveillance-including-cctv/>

The Surveillance Camera Commissioners Surveillance Code of Practice

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1035067/Surveillance_Camera_CoP_Accessible_PDF.pdf

to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.

5.3 The CCTV systems will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

5.4 The use of the CCTV systems will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

6 Location and Signage:

6.1 Cameras are sited to ensure that they cover the relevant areas as far as is possible. Cameras are installed throughout the Parish including roadways, car parks, buildings, premises and externally in public facing areas.

6.2 The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the relevant area, which may include public outdoor spaces.

7. Monitoring and Recoding:

7.1 Cameras are monitored in a secure private office within the Police area of The Severn Centre.

7.2 System administrators (The Council Chairperson, The Vice-Chairperson, the Council Clerk and any Councillors appointed to administer the CCTV system) can view and access footage for the purpose for which the CCTV system is in operation. Before any further disclosure is made (e.g., to an external organisation or another internal department) The Police must instruct the administrators to carry this out in emergency situations where they are unable to access the cameras themselves. All system administrators must have a recent DBS check or equivalent and are compliant with GDPR regulations and data protection before they are permitted to access the CCTV system.

7.3 Images are recorded on secure servers and are viewable by the Police and the system administrators in an emergency when the Police are unable to access.

7.4 Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g., time, date, location) is recorded reliably and compression of data does not reduce its quality.

7.5 Viewing monitors should be password protected and switched off with doors locked when not in use to prevent unauthorised use or viewing.

7.6 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure the images remain fit for purpose, and that the date and time stamp recorded on the image is accurate.

8. Subject Access Requests:

8.1 Requests by individual data subjects for images relating to themselves via a Subject Access Request should be made directly to the Police and if in emergency when the Police are unavailable, to The Parish Clerk in writing clerk@highleyparish.co.uk

8.2 Where the council is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure.

8.3 A search request should specify reasonable accuracy (e.g., within 30 minutes)

9. Third Party Disclosures:

9.1 In limited circumstances, it may be appropriate to disclose images to a third party, such as when a disclosure is required by law in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.

9.2 Such disclosures will be made at the discretion of the system administrators, with reference to relevant legislation and following advice from the Police.

9.3 Where information is disclosed, the disclosing officer must ensure information is transferred securely and consideration given to whether images of third parties should be obscured to prevent unnecessary disclosure.

10. Retention:

10.1 Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 31 calendar days from the date of recording (or for some systems,

until storage limitations requires that footage needs to be over written)
Images will be automatically overwritten or destroyed at this time.

11. Complaints Procedure:

11.1 Complaints concerning the Councils use of CCTV systems to the disclosure of CCTV images should be made in the first instance to The Parish Clerk for further investigation.

11.2 Depending on the nature of the complaint, it will be processed under Parish Council Complaints Procedure or (more likely) treated as a data protection concern.