

Old Catton Parish Council

CCTV Policy

1. Purpose

The Parish Council uses Closed-Circuit Television (CCTV) systems to enhance community safety, protect property, and assist in the prevention and detection of crime. This policy outlines the principles governing the use and management of CCTV systems to ensure compliance with legal obligations and the protection of individuals' privacy.

2. Scope

This policy applies to all CCTV systems operated by the Parish Council, including cameras installed on Council-owned property, public spaces managed by the Council, and any areas where monitoring is deemed necessary for community safety. It covers the recording, storage, use, disclosure and deletion of CCTV images

3. Objectives

The objectives of the CCTV system are:

- To deter and detect criminal activity and anti-social behaviour.
- To protect Parish Council property and assets and facilities.
- Promote the safety and security of the public, staff, and volunteers.
- To monitor public spaces to enhance community safety.
- To assist law enforcement and other statutory bodies where lawful.

CCTV will not be used:

- For the routine monitoring of staff performance
- For covert surveillance unless separately and lawfully authorised
- For facial recognition or biometric identification

4. Legal Framework

The operation of CCTV systems will comply with:

- The Data Protection Act 2018
- UK GDPR.
- Data (Use and Access) Act 2025
- The Protection of Freedoms Act 2012.
- The Surveillance Camera Code of Practice issued by the Home Office.
- The Human Rights Act 1998.

The Council recognises that ICO guidance on CCTV and data protection is being updated following the Data (Use and Access) Act 2025 and will review this policy as guidance develops.

5. Responsibilities

- **Parish Council:**
 - Is the Data Controller

- Ensures compliance with this policy and relevant legislation
- Approves and reviews Privacy Impact Assessments (PIA)
- **Clerk to the Council:**
 - Oversee the day-to-day operation of the CCTV system.
 - Maintains access control records and disclosure logs.
 - Co-ordinates responses to subject rights requests

A Data Protection Officer will be consulted where appropriate.

6. Reason for Use

CCTV is used to:

- Deter and detect criminal activity to maintain public safety.
- Protect Council-owned property and assets from damage, theft or vandalism.
- Monitor public spaces to enhance the safety and security of residents, visitors and Council employees.
- Provide evidence for law enforcement agencies to aid in criminal investigations or legal proceedings.
- Assist in resolving disputes and incidents that occur in areas under the Council's management.

7. System Use

- CCTV will only be used for the purposes specified in this policy.
- Cameras will be sited to minimise intrusion into private areas.
- No audio recording is undertaken
- The system does not use:
 - facial recognition
 - biometric identification
 - behavioural analytics
- Viewing and downloading of footage is restricted to authorised personnel.
- Monitoring of public spaces will be conducted to enhance safety and security while respecting individuals' rights and privacy.
- CCTV may incidentally capture images of individuals passing through adjacent public areas, including nearby school access point. The system is not used to monitor or identify individuals and is operated solely for the purposes set out in this policy, including community safety and the protection of Council property.

8. Privacy Impact Assessment (PIA)

- A PIA will be completed:
 - Before new CCTV installations
 - When locations, technology or purpose change
 - When legislation or ICO guidance materially changes
- The PIA will be reviewed annually to ensure ongoing compliance and relevance.

9. Signage and Transparency

- Clear and visible signage will be placed in areas where CCTV is in operation.

- The signage will indicate that CCTV is in operation and identify Old Catton Parish Council as the operator of the system.
- Signage will direct individuals to where further information about the Council's use of CCTV and their data protection rights can be obtained, including the Council's CCTV Privacy Notice (Appendix A) or by contacting the Clerk of the Council.

10. Data Retention and Deletion

- Recorded footage will be retained for no longer than necessary, typically 30 days, unless required for an ongoing investigation or legal proceedings.
- Images required for an investigation or legal proceedings may be retained longer, then deleted
- Deletion is automatic where technically possible
- Foot will be securely erased or overwritten to prevent unauthorised recovery.

11. Security and Access Controls

The Council will ensure:

- Secure storage of images
- Encrypted storage where support by the system
- Role-based access controls
- Audit trails of viewing, copying and disclosure.

12. Use of Data Gathered by CCTV

- Data collected through CCTV will be used solely for the purposes outlined in this policy, including the prevention and detection of crime, ensuring public safety, and protecting property.
- Data will not be used for monitoring or profiling individuals without lawful justification.
- Access to data will be restricted to authorised personnel who require it to carry out their duties.
- Sharing of data with third parties, including law enforcement, will be carried out in compliance with GDPR and only when legally permissible.
- Images will not be released for entertainment or social media purposes

13. Access and Disclosure

- Requests for access to CCTV footage by individuals will be handled in accordance with data protection laws and GDPR requirements.
- Disclosure of footage to third parties, such as law enforcement, will only occur when legally permissible and in compliance with GDPR principles.

14. Subject Access Requests

- Individuals have the right to request access to personal data recorded by CCTV systems under the GDPR.
- Subject Access Requests (SARs) should be submitted in writing to the Clerk to the Council, providing sufficient details to identify the relevant footage, including date, time, and location.
- Searches will be reasonable and proportionate

- The Council will respond to SARs within one calendar month, in accordance with GDPR requirements. Response period may be paused while clarification is awaited
- Where fulfilling a SAR would involve disclosing data about other individuals, the Council will redact or blur those individuals' data unless they have consented to the disclosure or it is otherwise lawful to disclose.
- Requests may be refused where an exemption applies (eg crime prevention)

15. Maintenance and Review

The Council will ensure that:

- CCTV equipment is maintained in good working order
- Cameras and signage remain appropriately located
- This Policy is reviewed annually

16. Complaints

Complaints regarding the use of CCTV should be directed to the Clerk to the Council and will be handled in accordance with the Council's complaints procedure.

Individuals who remain dissatisfied may complain to the ICO.

17. Policy Approval and Adoption

This policy was approved and adopted by the Parish Council on 13th January 2025.

Reviewed: 12th January 2026

APPENDIX A – CCTV PRIVACY NOTICE

Old Catton Parish Council operates closed-circuit television (CCTV) systems in certain public buildings and public spaces for the purpose of community safety, crime prevention and the protection of Council property and assets.

Who is responsible for the CCTV system

Old Catton Parish Council is the **Data Controller** for the CCTV system.

Contact details:

Clerk of the Council

Old Catton Parish Council

Email: clerk@oldcattonparishcouncil.co.uk

Purpose of CCTV

CCTV is used to:

- Deter and detect crime and anti-social behaviour
- Protect Council buildings, property and assets
- Promote the safety and security of residents, visitors, staff and volunteers
- Assist law enforcement in the investigation of incidents.

CCTV is **not used** for routine staff monitoring, facial recognition, biometric identification or audio recording.

Legal basis for processing

The Council processes CCTV images under **Article 6(1)(e) UK GDPR – performance of a task carried out in the public interest**, relating to community safety and the protection of public assets.

How CCTV images are used

Access to recorded footage is restricted to authorised personnel only.

Images may be shared with law enforcement agencies where it is lawful and necessary to assist in the investigation of crime or incidents.

CCTV images will not be used for any unrelated purposes and will not be released for entertainment or social media use.

Retention of footage

Recorded CCTV images are normally retained for **up to 30 days** before being automatically overwritten.

Footage may be retained for longer where it is required.

Individuals' rights

Individuals have rights under UK data protection law, including the right to request access to personal data held about them.

Requests for access to CCTV footage should be made to the Clerk of the Council and should include sufficient information (such as date, time and location) to help identify the relevant footage.

Where footage includes images of other individuals, the Council may redact or blur those images where reasonably possible.

Further information

Further information about the Council's use of CCTV can be obtained from the Clerk of the Council or by viewing the Council's CCTV Policy on the Council website.

Individuals who are dissatisfied with the handling of their personal data may complain to the **Information Commissioner's Office (ICO)**.