

Chesterton Parish Council

CCTV Policy

Introduction

1. The Chesterton Parish Council uses closed circuit television (CCTV) images for the prevention, identification, and reduction of crime and to monitor the Chesterton Community Centre building in order to provide a safe and secure environment for staff, Regular Bookings, Public Bookings, and visitors, and to prevent the loss of or damage to Chesterton Community Centre contents and property.
2. The CCTV system is owned by the Chesterton Parish Council and managed by the Chesterton Community Centre Booking Manager. The Chesterton Community Centre is the system operator, and the data controller, for the images produced by the CCTV system, and is registered with the Information Commissioner's Office.
3. The CCTV system is operational and is capable of being monitored 24 hours a day, every day of the year.

Purpose

1. This Policy governs the installation and operation of all CCTV cameras at the Chesterton Community Centre.
2. CCTV surveillance is used to monitor and collect visual images for the purposes of:
 - Protect the buildings and assets, both during services (externally) or office hours and after hours.
 - promoting the health and safety of Staff, Bookings, 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 rules are respected so that the site/s can be properly managed.

Scope

1. This policy applies to Chesterton Parish Council and also to any separate legal entities owned and controlled by them which occupy premises controlled by the CCTV system.
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 of the partner organisations has clear responsibilities, with clarity over obligations and expectations, and procedures for the resolution of any differences between the parties or changes of circumstance.
3. This policy is applicable to and must be followed by all staff and contractors. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to Councillors, trustees, and committee members.
4. The Community Centre Manager and Parish Council Clerk involved in the operation of the CCTV System 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.
5. All systems users Booking Manager and Parish Clerk 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.

Definitions

CCTV – closed circuit television camera. A TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes, and where access to their content is limited by design only to those able to see it.

Covert surveillance - observation, and/or recording, carried out without the subject's knowledge and may be done using cameras or devices that are not visible to the subject.

Data controller - the natural or legal person, public authority, agency, or other body which, alone or jointly with others, determines the purposes and means of the processing of CCTV images.

Data Protection Act 2018 (DPA) - UK data protection framework, regulating the processing of information relating to individuals.

ICO CCTV Code of Practice 2017 - recommendations on how the legal requirements of the Data Protection Act 1998 can be met when using CCTV, issued by the Information Commissioner's Office. The guidance will be updated to comply with current legislation.

Surveillance Camera Code of Practice 2013 - statutory guidance on the appropriate and effective use of surveillance camera systems issued by the Government in accordance with Section 30 (1) (a) of the Protection of Freedoms Act 2012.

System Operator – a person or persons that take a decision to deploy a surveillance system, and/or are responsible for defining its purpose, and/or are responsible for the control of the use or the processing of images or other information obtained by virtue of such system.

System User - person or persons who may be employed or contracted by the system operator who has access to live or recorded images or other information obtained by virtue of such a system.

Policy

Policy statement

1. The Chesterton Parish Council/Community Centre will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
2. The Chesterton Parish Council complies with the Information Commissioner's Office (ICO) CCTV Code of Practice 2017 to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
3. The CCTV system 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.
4. The use of the CCTV system 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.
5. Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:
 - cover the specific area to be monitored only.
 - keep privacy intrusion to a minimum;
 - ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage);
 - minimise the risk of damage or theft.
6. Interior CCTV will not record areas set aside for private devotions where one would not expect to be filmed while changing areas or toilets.

Location and signage

1. Cameras are sited to ensure that they cover the premises as far as possible. Cameras are installed throughout the site/s including roadways, car parks, buildings, premises, within buildings, and externally in vulnerable public-facing areas.

2. The location of equipment is carefully considered to ensure that the images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the Chesterton Parish Council premises, which may include outdoor areas.
3. Signs are placed at all pedestrian and vehicular entrances in order to inform staff, visitors, and members of the public that CCTV is in operation.
4. The signage indicates that monitoring and recording are taking place, for what purposes, the hours of operation, who the system owner is, and where complaints/questions about the systems should be directed.

Monitoring and recording

Cameras are monitored in a secure private office

1. Images are recorded on secure servers and are viewable by Chesterton Parish Council Clerk / Community Centre Manager only. To monitor cameras sited within their own areas of responsibility on a view-only basis.
2. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
3. All images recorded by the CCTV System remain the property and copyright of the Chesterton Parish Council.

Data Protection

1. In the administration of its CCTV system, the Chesterton Parish Council complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and in accordance with the Chesterton Parish Council Data Protection Policy.

Data Protection Impact Assessments

2. The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This will include consultation with relevant internal and external stakeholders.

Applications for disclosure of images

3. Where the Chesterton Parish Council is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or 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, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.
A request for images made by a third party should be made to Clerk@chestertonparishcouncil.org.uk
4. 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.
5. Such disclosures will be made at the discretion of Chesterton Parish Council with reference to relevant legislation and where necessary, following advice from ICO.
6. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
7. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
8. Images may be released to the media for purposes of identification. Any such decision to disclose will be taken in conjunction with the Police and/or other relevant law enforcement agencies.
9. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted, or published for any other purpose.

Complaints Procedure

1. Complaints concerning the Chesterton Parish Council's use of its CCTV system, or the disclosure of CCTV images should be made to clerk@chestertonparishcouncil.org.uk
2. The complaints procedure is available on the Chesterton Parish Council website here: www.chestertonparish.org.uk
3. When requested, anonymised information concerning complaints will be provided to the Surveillance Commissioner.

Responsibilities

1. The Chesterton Parish Council is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring, and ensuring compliance with this policy.
2. The Chesterton Parish Council is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
3. The Clerk Chesterton Parish Council and Chesterton Community Centre are responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.