

Compton Parish Council

CCTV Policy



Version number	2.0	Minute reference	23/033
Adopted by	Full Council	Review due	AMPC May
Date adopted	22 nd May 2023		

1. Project aims and objective:

Compton Recreation Ground.

CCTV was installed after a number of years of reports of misuse in the area such as vandalism and anti-social behaviour, including the presence of alcohol and cannister items.

There will be two cameras installed, one located on the Sports Pavilion and one located in the car parking area. Access to the camera data is from a system locked in a secure box within the kitchen of the Sports Pavilion.

2. Guiding Principles

Principle 1: The use of a surveillance camera system must always be for a specific purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need:

The use of the CCTV is to ensure the Recreation Ground is a safe place to be for all the community. The Council will operate a system of 2 CCTV cameras located at the Sports Pavilion and in the car park at Compton Recreation Ground, for the prevention and detection of crime and antisocial behaviour. The CCTV will be monitored by the Parish Clerk and where results show offenders causing damage or misuse of the area, this will be shared with the police.

In a closed, confidential session of the Parish Council images will be shown to the Councillors to see if anyone can identify anyone in the images. Any information from this will be forwarded to the police. The images will not leave the meeting room and Councillors can only view them at the closed session and not take images away with them. Information will remain confidential to that part of the meeting.

Principle 2: The use of a surveillance system must take into account its effects on individuals and their privacy with regular annual reviews to ensure its use remains justified.

Whilst captured data is not assessed as personal data, a review of a privacy impact assessment has

been undertaken and will be periodically reviewed – see the privacy impact assessment.

The Council shall not: deploy surveillance camera systems in public places where there is a high expectation of privacy. All cameras will be facing outward of the pavilion and not inside. The cameras will also not be overlooking the neighbouring properties into their gardens.

Principle 3: There must be as much transparency in the use of a surveillance camera as possible including a published contact point for access to information and complaints.

The Council shall ensure that sufficient signage is in place in all areas covered by any surveillance system, and that the Council's privacy policy, CCTV and surveillance policy, complaints policy, and other relevant documents are published on its website.

The Parish Clerk can be contacted on 07748 591920 or cmoptonparish@gmail.com for any queries related to the CCTV.

Principle 4: There must be a clear responsibility and accountability for all surveillance camera system activities including image and information collection, held, and used.

The Recreation Ground is owned and managed by Compton Parish Council.

The Data Controller and Data Owner (Compton Parish Council) shall have overall ownership for the surveillance systems in place, with the System Manager (Parish Clerk) having responsibility for ensuring that proper governance arrangements are in place and ensuring that such arrangements are communicated to and adhered to by any system users such as any Councillors who have been authorised to have access.

Principle 5: Clear rules 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.

The System Manager will ensure that all system users are aware of the contents of this policy and have sufficient training to use the equipment safely and securely.

Principle 6: No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance system and such images and information should be deleted once their purpose has been discharged.

As a default, all images captured shall be deleted without review, unless the system manager is satisfied beforehand that there is a legitimate reason, under Principle 1, for it being accessed and viewed. CCTV Images are stored for a period of up to 30 days, following which they are automatically overwritten. Any data passed to the police will then be in accordance with the powers and duties under the General Data Protection Regulations and the Regulations of Investigatory Powers Act.

The Parish Clerk will regularly log into the CCTV system to ensure it is working correctly. No images will be downloaded unless anti-social behaviour or detections of crime have occurred.

Principle 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.

Access to all images by any permitted users is solely for the purposes set out in Principle 1 above. Access to stored images is restricted to the System Manager.

Where footage is extracted for the purposes of passing this to a third party (e.g. the Police for the identification of an offender) the Council shall ensure this complies with any data protection legislation, and any stipulations in its Data Retention Statement and Privacy Policy. The Council shall also take reasonable steps to ensure the third party has in place practices and procedures to comply with data protection regulations.

Principle 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.

The System Manager shall ensure that the operation and management of CCTV, and that all surveillance equipment meets any such standards as made available by the Surveillance Camera Commissioner. The CCTV shall undergo regular maintenance to ensure it is working and cameras are all in the correct direction and location.

Principle 9: Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

The System Manager shall follow guidance as outlined in the Amended Surveillance Camera Code of Practice. All CCTV DVRs and SD cards used to capture images shall be password protected. The system is in a locked cabinet which only the Parish Clerk can access.

Principle 10: There should be effective review and audit mechanism to ensure legal requirements, policies and standards are complied with in practice and regular reports should be published.

The Data Controller shall review this policy and privacy impact assessments, along with the number and positioning of surveillance cameras, in line with the Amended Surveillance Camera Code of Practice 2022.

Principle 11: When the use of a surveillance camera 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 ways to support public safety and law enforcement with the aim of processing images and information of evidential value.

The Data Controller shall ensure that the quality and positioning of any surveillance equipment is such so as to achieve the highest quality and most useful images, including the use of HD cameras and IR night vision. Where images are to be used for law enforcement and criminal proceedings, the Council will ensure that there is an audit trail of all images used, and that such images are available in a readily exportable format without the loss of forensic integrity. These images shall only be shared with the Police and not available to the general public.

In a closed, confidential session of the Parish Council, images will be shown to the Councillors to see if anyone can identify anyone in the images. Any information from this will be forwarded to the police. The images will not leave the meeting room and Councillors can only view them at the closed session and not take images away with them. Information will remain confidential to that part of the meeting.

Principle 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.

The Council does not have, nor has no intention of using, a reference database for the purposes of matching data captured from its surveillance systems. Any data to be used with regards to criminal activity shall be passed to the police for them to take action.