

CCTV Policy

1. Purpose

1.1 Rusper Parish Council (“the Council”) recognises the role of Closed-Circuit Television (CCTV) in supporting community safety, protecting property, and assisting in the prevention and detection of crime.

1.2 This policy sets out the Council’s position in relation to CCTV systems associated with Council-owned or Council-funded assets, and clarifies responsibilities where CCTV systems are operated by third parties.

1.3 The Council is committed to ensuring that any involvement with CCTV is lawful, proportionate, and transparent in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Protection of Freedoms Act 2012.

2. Scope

2.1 This policy applies to CCTV systems:

- Owned and operated directly by the Council; and
- Installed in Council-funded projects where the Council has an interest but does not control operation or data.

2.2 This policy specifically recognises that a CCTV system has been installed at the Community Shop using funding provided by the Council.

2.3 For the avoidance of doubt, the CCTV system located at the Community Shop is:

- Owned and operated solely by the Community Shop (or its governing body);
- Not controlled, managed, or monitored by Rusper Parish Council; and
- Not part of the Council’s data processing activities.

2.4 This policy applies to councillors, employees, volunteers, contractors, and members of the public only in relation to CCTV systems controlled by the Council.

3. Community Shop CCTV System – Governance and Responsibility

3.1 The Council confirms that its involvement with the Community Shop CCTV system is limited to financial support for installation only.

3.2 The Council does not:

- Operate or manage the CCTV system at the Community Shop;
- Have access to CCTV footage or live monitoring;
- Determine retention periods or technical settings;
- Act as the data controller or joint controller for the system;
- Process any personal data generated by the system.

3.3 The Community Shop (or its managing body) is solely responsible for:

- Compliance with UK GDPR and the Data Protection Act 2018;
- Handling all Subject Access Requests (SARs);
- Managing signage, retention, security, and access control;
- Acting as the Data Controller for the system.

3.4 Any request for CCTV footage from the Community Shop system must be directed to the Community Shop, not the Parish Council.

4. Objectives of Council-Operated CCTV

4.1 Where CCTV is operated directly by the Council, it is used for:

- Prevention and detection of crime and anti-social behaviour
- Protection of Council property and assets
- Public safety and reassurance
- Support for investigations and insurance matters
- Enforcement of Council bylaws and regulations

4.2 Council-operated CCTV will not be used for intrusive or continuous monitoring of individuals.

5. Legal Basis (Council-Operated Systems Only)

5.1 Where the Council operates CCTV systems, processing is carried out under:

- Public task
- Legal obligation
- Legitimate interests (where appropriate and proportionate)

5.2 All Council-operated systems will comply with the Surveillance Camera Code of Practice under the Protection of Freedoms Act 2012.

6. Operation and Access (Council Systems Only)

6.1 Access to Council-operated CCTV systems is restricted to authorised personnel only, typically the Clerk and Chair or nominated officers.

6.2 Access to footage shall be logged and monitored.

6.3 Appropriate technical and organisational measures shall be in place to ensure security of data.

7. Signage and Transparency

7.1 Where the Council operates CCTV, clear signage will be displayed stating:

- CCTV is in operation
- Purpose of monitoring
- Identity of the Data Controller (Rusper Parish Council)
- Contact details for enquiries

7.2 For the Community Shop CCTV system, signage and transparency obligations are the responsibility of the Community Shop as the Data Controller.

8. Data Retention

8.1 Council-operated CCTV footage will normally be retained for up to 30 days unless required for investigation or legal purposes.

8.2 The Community Shop determines its own retention policy for its CCTV system.

9. Subject Access Requests (SARs)

9.1 Individuals have the right to request access to personal data under UK GDPR.

9.2 For Council-operated CCTV systems, SARs must be submitted to the Parish Clerk.

9.3 For the Community Shop CCTV system:

- The Council is not the Data Controller;
- The Council cannot provide access to footage;
- All SARs must be directed to the Community Shop.

9.4 The Council shall not be responsible for responding to or facilitating SARs relating to the Community Shop system.

10. Data Sharing

10.1 CCTV footage held by the Council may only be shared:

- With law enforcement agencies where legally required; or
- Under court order or statutory obligation.

10.2 The Council has no authority to share or access footage from the Community Shop CCTV system.

11. Maintenance and Review

11.1 Council-operated CCTV systems will be maintained to ensure functionality and compliance.

11.2 This policy will be reviewed annually or following any legislative or operational changes.

12. Complaints

12.1 Complaints regarding Council-operated CCTV should be made to the Parish Clerk.

12.2 Complaints regarding the Community Shop CCTV system must be directed to the Community Shop.

12.3 Where appropriate, individuals may escalate concerns to the Information Commissioner's Office (ICO).