

COLLIER STREET PARISH COUNCIL

DATA PROTECTION & CCTV POLICY

The Parish Council recognises its responsibility to comply with the Data Protection Act 2018.

The act regulates the use of personal data. This does not have to be sensitive data; it can be as little as a name and address.

The Data Protection Act 2018 the General Data Protection Regulation 2018 sets out high standards for the handling of personal information and protecting individuals rights for privacy. It also regulates how personal information can be collected, handled and used.

The Data Protection Act applies to anyone holding personal information about people, electronically or on paper.

As a local authority, the Parish Council has a number of procedures in place to ensure that it complies with The Data Protection Act 2018 when holding personal information.

The Parish Council has also notified the Information Commissioner's Office that it holds personal data about individuals. When dealing with personal data, the Parish Council staff and Councillors must ensure that:

- **Data is processed fairly and lawfully.** This means that personal information should only be collected from individuals if staff and councillors have been open and honest about why they want the personal information.
- **Data is processed for specified purposes only.**
- **Data is relevant to what it is needed for.** Data will be monitored so that too much or too little is not kept; only data that is needed should be held.
- **Data is accurate and kept up to date.** Personal data should be accurate, if it is not, it should be corrected.
- **Data is not kept longer than it is needed.** Data no longer needed will be shredded or securely disposed of.
- **Data is processed in accordance with the rights of individuals, who must be informed, upon request, of all the personal information held about them.**
- **Data is kept securely.** Only staff and Councillors can access the data. It cannot be accessed by members of the public.

Storing and accessing data.

The Parish Council recognises its responsibility to be open with people when taking personal details from them.

This means that councillors and staff must be honest about why they want a particular piece of personal information. , for example, a member of the public gives their phone number to staff or a member of the Parish Council, this will only be used for the purpose

it has been given and will not be disclosed to anyone else without the person's permission.

The Parish Council may hold personal information about individuals such as their addresses and telephone numbers. These will be securely kept at the Parish Office and are not available for public access.

All data stored on the Parish Office computers are password protected. Once data is not needed anymore, is out of date, or has served its use and falls outside the minimum retention time of Council's document retention policy, it will be shredded or securely deleted from the computer.

The Parish Council is aware that people have the right to access any personal information that is held about them, through Subject Access Request (SAR). They may do this verbally or in writing to The Clerk.

If a person requests to see any data that is being held about them:

- They must be sent all of the personal information that is being held about them.
- There must be an explanation for why it has been stored
- There must be a list of who has seen it
- It must be sent within one month.
- There will be no fee to provide this (unless the request was specifically complex and involved a considerable amount of time and paperwork to produce).

Disclosure of personal information

If an elected member of the council, for example a councillor, needs to access information to help carry out their duties, this is acceptable.

They are only able to access as much information as necessary and it should only be used for that specific purpose. However, before they access any sensitive information about a person, they would need consent to do this from the Parish Clerk. However, all correspondence with members of the public is to be conducted through The Clerk.

Data should never be used for political reasons unless the data subjects have consented.

Confidentiality

Parish Councillors and staff must be aware that when complaints or queries are made, they must remain confidential unless the subject gives permission otherwise. When handling personal data, this must also remain confidential.

CCTV and ANPR Policy

1. Purpose of the System

The Parish Council operates a Closed-Circuit Television (CCTV) and Automatic Number Plate Recognition (ANPR) system within the village car park.

The system is installed and maintained for the following purposes:

- The prevention and detection of crime and anti-social behaviour
- The protection of public safety
- The safeguarding of Parish Council assets
- The support of law enforcement agencies where appropriate

The system will not be used for any purpose other than those stated above.

2. Lawful Basis

The Parish Council processes personal data obtained via CCTV and ANPR under Article 6(1)(e) of the UK General Data Protection Regulation (UK GDPR), namely that processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Council.

Where applicable, processing may also be supported by Article 6(1)(f) (legitimate interests), in particular for crime prevention and public safety.

3. Data Controller

The Parish Council is the Data Controller for all CCTV and ANPR data collected. The Council is responsible for ensuring compliance with all relevant data protection legislation, including the UK GDPR and the Data Protection Act 2018.

4. Operation and Responsibilities

The Parish Council has designated specific roles in relation to the operation of the CCTV system:

- All Councillors may access live viewing of CCTV footage where necessary and appropriate
- Playback access is restricted to:
 - The Chair
 - The Vice-Chair
 - The Clerk
 - The appointed Admin Councillor
- The appointed Admin Councillor is the designated CCTV Operator and is responsible for:

- The day-to-day operation of the system
- Maintenance and technical oversight
- Ensuring recordings are handled in accordance with this policy

All authorised persons must ensure that access to footage is justified, proportionate, and recorded where appropriate.

5. Data Collection and Use

CCTV and ANPR systems may capture:

- Images of individuals
- Vehicle registration numbers
- Vehicle movements within the car park

Data will only be used for the purposes outlined in this policy and will not be used for monitoring individuals without a lawful and justified reason.

6. Retention of Data

Recorded data will be retained only for as long as necessary to fulfil the purposes for which it was collected.

Unless required for an ongoing investigation or legal proceedings, CCTV and ANPR recordings will typically be retained for a maximum period of 28 days, after which they will be automatically overwritten or securely deleted. Where footage is required by the Police or another law enforcement agency in connection with a specific investigation, it may be retained for longer, provided that such retention is necessary, proportionate, and appropriately documented.

7. Disclosure of Data

CCTV and ANPR data may be shared with:

- Law enforcement agencies, such as the Police, where a formal request is made
- Other relevant authorities where there is a lawful basis to do so

All disclosures will be recorded and must comply with data protection legislation. Data will not be disclosed to third parties without proper authority.

8. Signage

Clear and visible signage is in place within the car park (and on Notice Board) to inform individuals that CCTV and ANPR systems are in operation.

Signage includes:

- The purpose of monitoring
 - The identity of the Data Controller (the Parish Council)
 - Contact details for further information
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9. Security of Data

Appropriate technical and organisational measures are in place to protect CCTV and ANPR data against unauthorised access, loss, misuse, or disclosure.

Access to recordings is restricted to authorised individuals only, and systems are secured by appropriate controls.

10. Individual Rights

Individuals have rights under the UK GDPR in relation to their personal data, including the right to:

- Request access to their personal data (Subject Access Request)
- Request erasure or restriction of processing where applicable
- Object to processing in certain circumstances

Requests should be made in writing to the Parish Clerk. The Council will respond in accordance with statutory requirements.

11. Compliance and Review

The Parish Council will ensure that the use of CCTV and ANPR systems complies with the guidance issued by the Information Commissioner's Office (ICO), including the Surveillance Camera Code of Practice.

This policy will be reviewed regularly to ensure it remains compliant with legal requirements and reflects operational practice.

12. Protection of CCTV Equipment and Misuse

The Parish Council takes any interference with, or damage to, its CCTV and ANPR equipment seriously.

Any attempt to tamper with, obstruct, damage, or interfere with CCTV or ANPR cameras, associated equipment, or supporting infrastructure will be treated as a serious matter. This includes, but is not limited to, physical interference, vandalism, or attempts to disable or obstruct the system.

Where such incidents occur, the Parish Council will:

- Report the matter to the Police
- Provide relevant CCTV or ANPR footage to assist with any investigation
- Support the prosecution of offenders where appropriate, including for offences relating to criminal damage

The Parish Council reserves the right to take any further action considered necessary to protect its assets and ensure the continued operation of the system.