

Ardleigh Parish Council CCTV Policy and Procedures

This document was adopted by the Council at its meeting held 10 October 2022, Minute Ref. 22.136

CCTV Policy

Introduction

This policy is to control the management, operation, use and confidentiality of the CCTV system located at the Ardleigh Village Hall, Station Rd, Ardleigh, Essex CO7 7RS and covers Ardleigh Village Hall building and car parks and the Recreation Ground car park.. The site is owned and managed by Ardleigh Parish Council.

The policy was prepared after taking due account of the Code of Practice published by the Data Protection Commissioner (revised 2015).

This policy will be subject to periodic review by the Parish Council to ensure that it continues to reflect the public interest and that it and the system meets all legislative requirements.

The CCTV Scheme is registered with the Information Commissioner under the Terms of the Data Protection Act 1998. Registration Reference: ZA537616

Ardleigh Parish Council accepts the eight data protection principles based on the Data Protection Act 1998 as follows:

1. Personal data shall be processed fairly and lawfully and shall not be processed unless-
 - a. at least one of the exemption conditions in Schedule 2 of the Data Protection Act 2018 is met, and
 - b. in the case of sensitive personal data, at least one of the conditions in Schedule 3 is also met.
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be further processed in any manner incompatible with that purpose or those purposes.
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.
4. Personal data shall be accurate and, where necessary, kept up to date.
5. Personal data processed for any purpose or purposes shall not be kept for longer than is necessary for that purpose or those purposes.
6. Personal data shall be processed in accordance with the rights of data subjects under this Act.
7. Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.
8. Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures an adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Statement of Purpose

To provide a safe and secure environment for the benefit of those who might visit, work or live in the area. The system will not be used to invade the privacy of any individual, except when carried out in accordance with the law. The scheme will be used for the following purposes:

- to promote a safe community environment;
- to reduce the fear of crime by persons using facilities at the Ardleigh Village Hall and Recreation Ground so they can enter and leave the buildings and facilities without fear of intimidation by individuals or groups;
- to reduce vandalism of property and to prevent, deter and detect crime and disorder; to assist the police, the Parish Council and other Law Enforcement Agencies (and other relevant bodies such as insurance companies) with identification, detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime, public order or contravention of bye-laws;
- to deter potential offenders by publicly displaying the existence of CCTV, having cameras clearly sited that are not hidden and signs on display in areas being monitored;
- to assist all "emergency services" to carry out their lawful duties.
- To monitor security of the Ardleigh Village Hall and Ardleigh Recreation Ground.

Changes to the Purpose or Policy

Changes to the CCTV Policy will take place only after discussion and resolution at a full Parish Council meeting. Ardleigh Parish Council retains overall responsibility for the scheme.

CCTV Code of Practice

In its use of the CCTV system, Ardleigh Parish Council will comply with follow the 12 guiding principles of the Surveillance Camera Code of Practice, namely:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must consider its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies 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.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
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. A log of access to the system is available within the software.
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.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system 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 way to support public safety and law enforcement with the aim of processing images and information of evidential value.
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.

Accountability

- **Code of Practice:** A copy of the Data Protection Code for Surveillance Cameras and Personal Information is available on the Information Commissioner's Office website at www.ico.org.uk
- **How to make a subject access request:** An individual has a right to request access to the information we have on them. They can do this by contacting the Parish Clerk: (email: info@ardleigh-pc.gov.uk)
- **Complaints:** if you have a complaint about either the operation of the system or the failure to comply with the requirements of the code please contact the Parish Clerk (details above) or the Information Commissioner's Office (casework@ico.org.uk Tel: 0303 1231113)

Appendix A to Ardleigh Parish Council CCTV Policy and Procedures
Ardleigh Parish Council
CCTV Procedures

Definitions

SYSTEM OPERATOR

The body that takes a decision to deploy a surveillance system is responsible for defining the purpose, the control of its use and the processing of personal data. The system operator of the Ardleigh Parish CCTV System is Ardleigh Parish Council.

SYSTEM USERS

The persons employed by the System Operator with access to live or recorded images. The System Users of the Ardleigh CCTV System are the Parish Clerk, Deputy Clerk and Caretaker employed by the Parish Council.

THE CONTRACTOR

AceTech Ltd

THE ARDLEIGH CCTV SYSTEM

The cameras, DVR, monitor, cabling and internet link located at Ardleigh Village Hall. Appendix A shows the area of coverage of the CCTV system.

PRIVACY IMPACT ASSESSMENT

Privacy impact assessments (PIAs) are a tool that used to identify and reduce the privacy risks of a project with regard to personal data. A PIA can reduce the risks of harm to individuals through the misuse of their personal information. It can also help organisations design more efficient and effective processes for handling personal data.

PERSONAL DATA

Data that can identify an individual and/or that can be used to inform actions or decisions that affect them.

CCTV POLICY

The aim and purpose of the CCTV system and the guiding principles to be applied to it.

CCTV PROCEDURES

The detailed procedures assigned to the System Users which are to be followed in operating the system.

CCTV Procedures

Parish Clerk, Deputy Clerk and Village Hall Caretaker employed by the Parish Council are the designated System Users.

Security

The CCTV system is to be kept under lock and key at all times and is only to be accessed by the System Users or the installing contractor. Remote access is available to staff via Council-provided devices only.

Password protection is to be used to ensure unauthorised access is denied both at the site and from remote access.

Requests for Data Requests for data are likely to come from two sources:

- The Police when investigating a potential crime.
- An individual or individuals requesting information through a complaint or subject access request

These are the only reasons that data may be released, and this must always be carried out by the System Users or, in cases of their absence, the contractor. The contractor may only be approved access to release data with the agreement of the Clerk of Ardleigh Parish Council following consultation with Councillors.

Data to be considered for release will be saved to a removable disk and only that data which provides the information required is to be saved to a uniquely referenced removable disk or USB stick

A log of information provided as a result of a request is to be maintained by the System Users.

Removable disks are to be labelled clearly and a record kept of their whereabouts.

Removable disks or USB sticks must be cleared of data when it is no longer required.

Data Reliability

The system is to be regularly serviced and checked every 6 months to ensure that:

- Data can be transferred to a removable disk.
- Data quality is suitable for the purposes of crime detection and cameras cover the area required and no additional areas.

- Time stamps are up to date

Data Controller Register

The ICO register of data controllers is to be kept up to date by the System Operator.

Privacy Impact Assessment (PIA) The PIA is to be reviewed periodically.

Policy and Procedures Review

This Policy is to be kept under regular review and the next review is due in September 2024.

Committee Room Normal Use

In normal use the camera in the Village Hall Committee Room is to be set **NOT** to record. It can be set to record only at the verbal and written request of the Clerk following consultation with Councillors.

Appendix B to Ardleigh Parish Council CCTV Policy and Procedures
NB coverage shown by red hatching

AREA OF CCTV COVERAGE
ARDLEIGH PARISH COUNCIL

