

Brasted Parish Council

CCTV POLICY

This CCTV Policy was reviewed and adopted by the Council at its Meeting held on 13 May 2024.

Brasted Parish Council uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the council buildings and land in order to provide a safe and secure environment for its staff, members and visitors, and to prevent loss or damage to council property and surrounds. This policy outlines the council's use of CCTV and how it complies with the General Data Protection Regulation.

The CCTV system is owned and operated by Brasted Parish Council, the deployment of which is determined by the Parish Council.

The CCTV can be monitored securely from the Pavilion or from the app downloaded to authorised council members' mobile phones. This footage is not shared by council members with anyone else.

Access to the images is as agreed by the Parish Council and is restricted to three named councillors who are all DBS checked through their other activities.

The introduction of, or changes to, CCTV monitoring will be subject to the agreement of the Parish Council.

The Parish Council's 'Data Controller' (The Clerk) will publish this policy to ensure all councillors and users of the recreation ground and Pavilion are aware of the restrictions in relation to access and disclosure of recorded images.

The Parish Council's CCTV surveillance cameras are a passive technology that only records and retains images. They are not linked to automated decision making or facial or number plate recognition.

CCTV warning signs are clearly and prominently displayed in areas where CCTV is used.

The original planning, design and installation of the CCTV equipment endeavoured to ensure that the scheme will deliver maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

The cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated.

The Council will make every effort to position cameras so that their coverage is restricted to the Council's premises (outdoor areas). The system design is sympathetic to the privacy of the surrounding public and does not monitor public space outside the legitimate areas of interest for the Council.

Councillors have information on the location of the cameras.

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

All retained data is stored securely at all times and permanently deleted as appropriate / required.

Recorded images will be kept for no longer than 3 months, except where there is a lawful reason for doing so.

Access to recorded images will be restricted to those Councillors authorised to view them and will not be made more widely available.

Access to stored images will only be viewed in the course of investigating an incident.

Individuals have the right to request access to CCTV footage that constitutes their personal data unless an exemption applies in the General Data Protection Regulations.

All requests should be made in writing to the Clerk. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The Council will respond to requests within one month of receiving the written request and will charge a fee where a disproportionate effort is required to adhere to the request.

Disclosure of information from surveillance systems must be controlled and consistent with the purpose for which the system was established. When disclosing surveillance images of individuals, particularly when responding to subject access requests, the Council will consider whether the identifying features of any of the other individuals in the image need to be obscured. In most cases the privacy intrusion to third party individuals will be minimal and obscuring images will not be required. However, consideration will be given to the nature and context of the footage.

The subject will be supplied with a copy of the information in a permanent form. There are limited circumstances where this obligation does not apply. The first is where the data subject agrees to receive their information in another way, such as by viewing the footage. The second is where the supply of a copy in a permanent form is not possible or would involve disproportionate effort may incur an administrative fee.

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the Council where these would reasonably need access to the data (eg investigators).

Requests for images and data should be made in writing to the Clerk.

The data may be used within the Council's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

Data transfer will be made securely and using encryption as appropriate.

Complaints and enquiries about the operation of CCTV within the Council should be directed to the Clerk in the first instance.