

KING'S SUTTON PARISH COUNCIL: CCTV POLICY

INTRODUCTION

The Parish Council is required to adhere to the General Data Protection Regulations, with respect to all information or data held on CCTV.

The purpose of this policy is to regulate the management, operation and use of the CCTV system installed by the Parish Council. It should be read in conjunction with the "Memorandum of Understanding regarding CCTV equipment between King's Sutton Parish Council and King's Sutton Millennium Memorial Hall".

The Policy is intended to ensure that the Parish Council operates the CCTV system in compliance with GDPR, Surveillance Camera Code of Practice (12 guiding principles) and other relevant legislation.

King's Sutton Parish Council is registered on the Data Protection Register held at the Information Commissioner's Office. Registration number: Z216112X The Data Controller is King's Sutton Parish Council. The Data Protection Officer is Northants CALC.

PURPOSE OF THE CCTV SYSTEM

The Parish Council has installed the CCTV system to:

- Deter crime following a number of anti-social behavioural issues which have taken place on the Recreation Field
- Address issues of evidence of anti-social behaviour in the KSMMH car park
- Protect property including EV points
- Provide a safe and secure environment for residents and users of the hall

The camera locations were determined by reference to the locations of the anti-social behaviour incidences with input from the system installer: Wired4Tech: Colin Walker colinwalker@wired4tech.co.uk

The CCTV system is the property of the Parish Council, is recorded in its asset register and is insured by the Parish Council. The Parish Council is responsible for its ongoing maintenance.

The servers which support the cameras and record the images captured are kept securely in the Astrop Room. The Council understands that all systems, information, documents and recordings obtained and used as data is protected by GDPR. The viewing and copying of the images will be strictly controlled.

The images captured by the cameras are recorded whenever motion is detected. The images can be viewed when there has been a specific event and in line with appropriate guidance.

DESIGN AND OPERATION OF THE SYSTEM

There are 6 wide angled cameras and two zoom cameras installed on the exterior of the King's Sutton Millennium Memorial Hall. (The Zoom camera focus on the Rec)

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The cameras' locations and fields of vision have been installed so as not to focus on private homes, gardens, and other areas of private property. Where necessary blackout tape has been fixed to the camera lens to ensure privacy is maintained.

The locations of the cameras are detailed on a diagram held on file in the Parish Clerk's office

Warning signs have been placed in various locations on the building and in the noticeboard opposite the Rec to alert residents that CCTV is operational.

Points of contact information are clearly displayed inside and outside the hall so that individuals are aware of how to raise any queries.

The server is stored in a locked cabinet in the Astrop Room. The Parish Clerk holds the key which is locked in the Parish Office when not in use.

VIEWING AND STORING OF IMAGES

There are two active users of the CCTV system:

King's Sutton Parish Council: 1 user login: Parish Clerk
King's Sutton Millennium Memorial Hall: 1 user login: Hall Manager

In addition, Colin Walker of Wired4Tech has an administrator's login for the purpose of any maintenance required.

The following are authorised to view images captured by the CCTV system:

- The Parish Clerk
- The Hall Manager
- The Chairman of the Parish Council
- The Chairman of the King's Sutton Millennium Hall Committee
- Law enforcement agencies
- In limited circumstances and with reference to the Data Protection Officer, third parties who have submitted a subject access request.

When images are provided to any external body, including the Police, this will be done by downloading the information on to a USB memory stick. The following information will be recorded in the CCTV Operating File for every CD or memory stick produced.

- The date and time the information was provided to the external body
- The details of the person to whom the information has been provided, including their employing organisation and contact details
- The date and time covered by the images on the CD/Memory stick and the camera on which they had been captured
- The name of the person and their job title transferring the images onto the CD/Memory stick.

Information stored on the system constitutes personal data as defined by GDPR. An individual may ask to see images of themselves via a Subject Access Request.

RETENTION

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Images recorded by the system will not be kept any longer than is necessary to fulfil the purpose for which the information was obtained in the first place.

The retention period on the hard drive will vary according to the amount of activity data within a given time period.

Any downloaded information will be deleted once any subsequent action is concluded.

A record will be kept in the CCTV Operating File of any data downloaded.

MAINTENANCE OF THE SYSTEM

The Parish Clerk will check and confirm the efficiency of the system on a monthly basis to ensure that the equipment is recording properly, the cameras are all functional, image quality is suitable for the purpose for which it is intended and the date and time stamp on the image is accurate. These checks will be recorded in the CCTV Operating File. Any faults will be reported immediately to Wired4Tech.

Any maintenance, planned or unplanned, will be recorded in the CCTV Operating File as will any alterations/additions to the CCTV system. If the CCTV system is altered, for example if further cameras are added, this policy will be reviewed to ensure it is still fit for purpose.

BREACHES OF THE CODE

Any complaints about the operation of the CCTV system should be addressed to the Parish Clerk and dealt with under the Parish Council's complaints procedure.

REVIEW OF THE POLICY

The Policy will be subject to annual review or earlier where there are any alterations/additions to the system as specified. The review will include any issues raised by King's Sutton Millennium Memorial Hall Committee.

The policy review will include:

- Whether the use of a CCTV system remains justified or whether a less intrusive alternative is more appropriate.
- Whether the location of the cameras remains appropriate

Appendix A: Subject Access Request Form

Appendix B: Access Log Template

Approved on _____ 3rd Feb 2022, 3rd March 2022

Minute Reference _____ 215.21/22, 233.21/22

Date of Review _____ March 2023 _____

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CCTV Subject Access Request Form

General Data Protection Regulation and Data Protection Act 2018

Please complete the form and send it to the address at the end of the form. All fields marked * are mandatory.

Please note that recorded data is only held for approximately 28 days before it is deleted

1. PERSONAL DETAILS	
* Full Name	
* Postal Address (including postcode)	
* Telephone Number:	
* Email Address:	
2. INFORMATION REQUIRED	
* Date:	
* Times: <u>From</u> and <u>To</u> times must be provided	
* Location of camera:	
* Description of requested footage:	
3. DECLARATION	
I wish to have access to identifiable images that I believe King's Sutton Parish Council retains on me as outlined above. I understand that if any of the information given on this form is knowingly incorrect, I may be committing an offence.	
* Signed:	
* Date:	

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Note: we require proof of the applicant's identity and address to ensure that the person making this access request is acting legitimately and is the data subject for the personal data being requested. Please ensure you include a photocopy of proof of your identity (passport or driving licence) and address (utility bill less than three months' old) with your submission.

Checklist: Have you:	Yes	No
Completed the Access Request Form in full?		
Provided proof of your identity and address (two forms required)		
Signed and dated the Access Request Form?		

If you have ticked *No* to any question above, we regret we cannot process your request.

Please return this form to: The Parish Clerk, King's Sutton Millennium Memorial Hall, Astrop Road, King's Sutton, OX17 3PG . Requests with adequate information will be responded to within one month of their receipt.

FOR OFFICE USE ONLY	
As Data Protection & Information Compliance Officer, I hereby authorise <input type="checkbox"/> refuse <input type="checkbox"/> the disclosure of a DVD(s) in relation to the above location(s), date(s) and time(s).	
Signed:	
Date:	

Reasons for refusal (if applicable)

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Appendix B: Access Log Template

Date	Individual present with responsible for CCTV	Police Details (Name)	Police Details (ID)	Date of Incident	Nature of Incident	Outcome (with details of any data released)