



PANGBOURNE PARISH COUNCIL

CCTV POLICY

1. Introduction

The purpose of this policy is to govern the use, operation and management of the CCTV system owned by Pangbourne Parish Council. A full list of camera locations is recorded in Appendix 1.

This policy was prepared after a full review of all relevant legislation and complies with the guiding principles of the Data Protection Act 2018, GDPR, the Information Commissioner's Office CCTV Code of Practice Version 1.2 2017 and the Surveillance Camera Code of Practice 2013 (See Appendices 2 and 3).

2. Objectives

Pangbourne Parish Council want to provide a safe and secure environment for everyone that might live, visit or work in the village. The system will not be used to invade the privacy of any individual, except at the request of law enforcement agencies. The system will be used for the following purposes:

- To create a safer community
- To prevent, deter and detect crime and anti-social behaviour
- To reduce fear of crime and anti-social behaviour
- To protect property and assets owned by Pangbourne Parish Council

3. Privacy

The CCTV system will not be used to invade the privacy of any individual and will not be used for the monitoring of any individual without proper due cause. It will only be used to meet the objectives set out in section 2.

The cameras and signs will be clearly visible so that the public are aware of the system. There will be no covert or audio recording using this system. The signs will clearly state the owner of the system as Pangbourne Parish Council, along with contact details for any further queries.

4. Governance

Pangbourne Parish Council is the data controller and the Clerk is the single designated owner of the system. Pangbourne Parish Council takes full responsibility for the correct governance of this system. In order to restrict access and maintain data security only Pangbourne Parish Council staff are permitted to control and use the system. All users of the system must act in accordance with this policy.

The system meets the recognised and approved standards as laid out by the British Standards Institute. The system is secure to prevent unauthorised access or misuse. There will be regular checks to ensure that it is working correctly. Any complaints or requests for further information regarding Pangbourne Parish Council's CCTV system should be made in writing to either

- clerk@pangbourne-pc.gov.uk or
- Clerk to Pangbourne Parish Council, Pangbourne Parish Office, Village Hall, Station Road, Pangbourne, RG8 7AN

5. Use of CCTV images

Recorded images and videos will only be released to law enforcement agencies and images will not be provided to third parties. The data controller will determine whether to release recorded images, upon receipt of a written request. All data released will remain the property of Pangbourne Parish Council.

Recorded images and videos will be retained until the hard disc is full. After this has happened the recorded images and videos will be overwritten which will permanently delete them. This is likely to happen after a period of 30 days. Legitimate requests for retention of the recordings must occur within this time period or all videos and images will be permanently deleted or overwritten. The only exception to this would be if the data controller is required to retain them for longer by a law enforcement agency in order to investigate and detect a crime(s). Under these circumstances they will not be disposed of until the purpose for which they have been collected has been completed and they are confirmed as no longer required by the evidence gathering agency.

6. Subject access requests

Individuals have the right to access a copy of or view an image of themselves in accordance with the Data Protection Act 2018. These requests must be responded to within 1 calendar month of the request. Sufficient information confirming the identity of the requestor, the date, time and location must be provided to the data controller so that the request can be actioned. All data released will remain the property of Pangbourne Parish Council.

The data controller will make the final decision about disclosure. If there is infringement upon another individual's rights, the disclosure might prejudice the detection of crime or if the request is deemed excessive or manifestly unfounded, it may be refused.

Prepared by: J Simpson, Assistant Clerk

Adopted by Pangbourne Parish Council on: 08/09/20

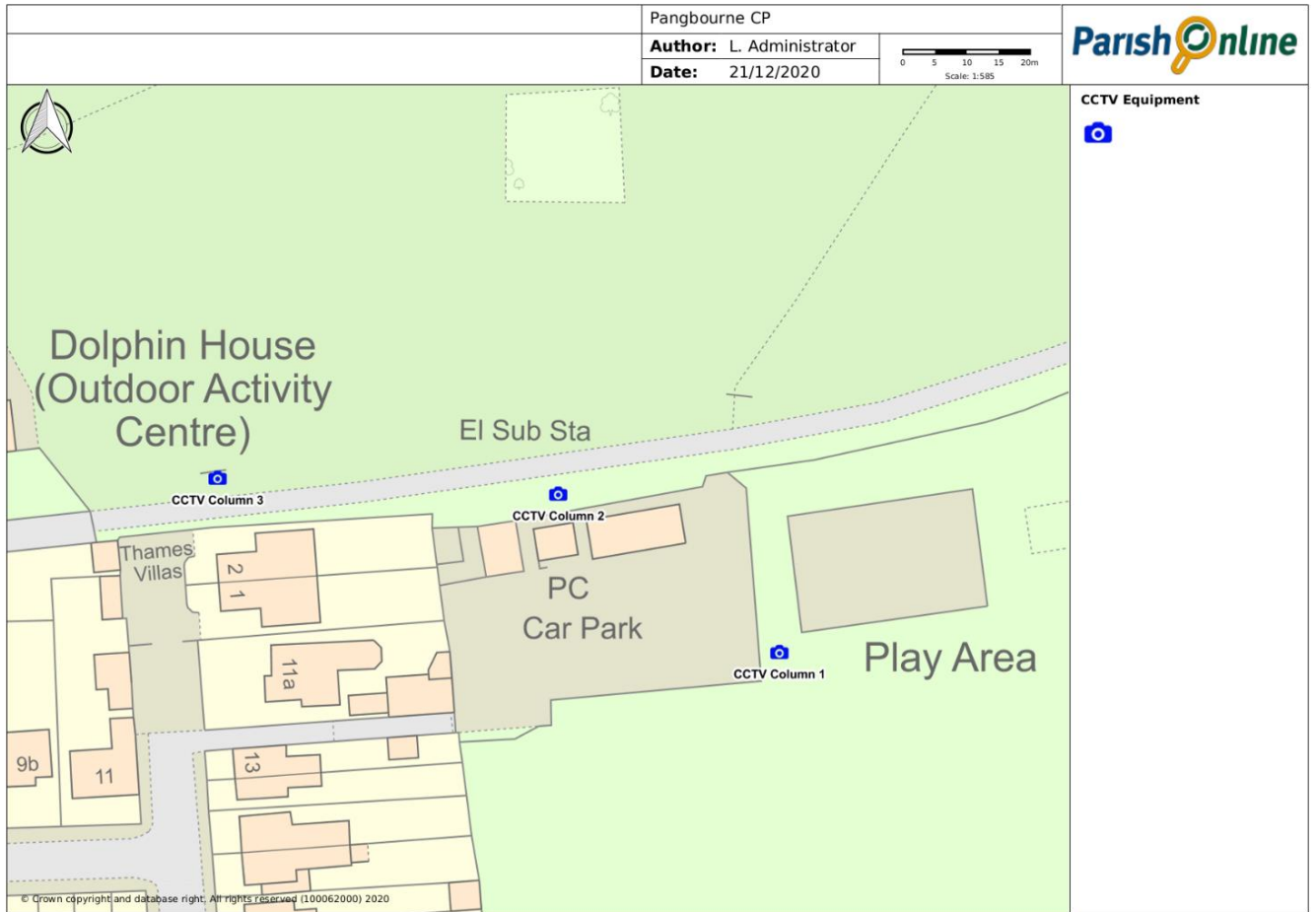
Review date: September 2021

Checklist for users of Pangbourne Parish Council's CCTV system

Requirement	Date completed and by whom	Timeframe for review	When last reviewed
Notification has been submitted to the Information Commissioner.		N/A	N/A
The Clerk to Pangbourne Parish Council is the named individual who is responsible for the operation of the system.		Annually	
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on an annual basis.		Annually	
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.		Annually	
Pangbourne Parish Council's website will provide the following: CCTV policy, the privacy impact assessment, map of CCTV system, how complaints will be investigated, and how people make subject access requests		Annually	
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.		Annually	
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.		Annually	
Cameras have been sited so that they provide clear images.		Annually	
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. The images will be retained for a period of approximately 30 days, unless instructed otherwise by a law enforcement agency.		Monthly	
Except for law enforcement bodies, images will not be provided to third parties.		Annually	
There are visible signs showing that CCTV is in operation, which state the owner and contact details.		Monthly	
Regular checks are carried out to ensure that the system is working properly and produces high quality images.		Monthly	
PPC to keep audit trail of requests from law enforcement agencies – including: details of the offence, authorising officer, details of when images removed and contact details of person removing them		Monthly	
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.		Monthly	
Set of still images to show camera angles to be produced and made available if requested.		Annually	

Appendix 1

Map of locations of CCTV cameras owned by Pangbourne Parish Council



Appendix 2

Guiding principles of the Surveillance Camera Code of Practice

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 take into account 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.
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.

Appendix 3

Useful documents and information

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>

<https://ico.org.uk/for-organisations/data-protection-act-2018/>

<https://www.gov.uk/request-cctv-footage-of-yourself>

<https://ico.org.uk/media/for-organisations/documents/2259722/subject-access-code-of-practice.pdf>