



NORTH TAWTON TOWN COUNCIL

14a The Square
North Tawton
EX20 2EP

Tel: 01837 880121

e-mail: townclerk@northtawtontowncouncil.gov.uk

This is a document that sets out North Tawton Town Councils approved and agreed practices. Any deviation must be by resolution of the full Council.

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CCTV Policy

1. Purpose

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at North Tawton Town Council.

CCTV systems are installed both internally and externally at the Town Council Office, and is intended for the purposes of:

- protecting Town Council buildings and assets, both during and after working hours;
- promoting the health and safety of staff and visitors;
- preventing bullying and/or intimidation by individuals and/or groups;
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the Town Council rules are respected so that the Town Council can be properly managed.

The CCTV is in operation 24 hours a day 7 days a week, regardless of whether the Town Council Office is open or closed.

The system does have the ability to record sound should this be considered necessary.

The CCTV system is owned and operated by the Town Council, the deployment of which is determined by Town Council members. The introduction of, or changes to, CCTV monitoring will be subject to consultation with Councillors. The CCTV is registered with the Information Commissioner under the requirements of the Data Protection Act 2018 and the General Data Protection Regulation (GDPR) 2016/679.

All authorised operators with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities. All members are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. Scope

This policy relates directly to the location and use of CCTV, and the monitoring, recording and subsequent use of such recorded material. The Town Council complies with the Surveillance Camera Code of Practice (PoFA 2012) as amended CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs are clearly and prominently placed at main external entrance, and within the main office area, and have established a system where there is maximum effectiveness and efficiency. It is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the Town Council, and this policy prohibits monitoring based on the characteristics and classifications contained in equality and other

related legislation e.g. race, gender, sexual orientation, national origin, disability etc. and that do not violate the individual's reasonable expectation to privacy.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Town Council. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018

3. Location of Cameras

The cameras are situated in the Town Council Office and are positioned to minimise blind spots and to obtain a full view of the main office room. There is another camera located outside of the building, which films the notice board and the outside approach to the entrance of the Office.

Town Council members and staff will have access to details of where CCTV cameras are situated. None will be placed covertly.

4. Covert Monitoring

The Town Council will not engage in any covert monitoring.

5. Storage and retention of CCTV images

CCTV images are not retained unless the images identify an issue and is retained specifically in the context of an investigation / prosecution relating to that issue.

Where data is retained, this would be in the form of an electronic file held on a secure central server where specific CCTV image / recordings are retained will be kept. The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the Town Council's purposes for recording information, and how long it is needed to achieve this purpose. An example would include the retention of images to assist in a criminal investigation.

6. Access to CCTV images

Access to recorded images will be restricted to Town Clerk and Deputy Clerk to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Town Council. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis, and images will only be viewed if necessary.

7. Subject Access Requests (SAR)

- Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.
- All requests should be made in writing to the Clerk and Responsible Officer who can be contacted by email to townclerk@northtawtontowncouncil.gov.uk Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location. It may not be possible to meet the request as images are not retained without good reason.

- The Town Council would not provide copies of CCTV footage, but instead the applicant may view the CCTV footage, if available, within the Town Council Office.
- The Town Council will respond to requests within 7 working days of receiving the request.
- The Town Council reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8. Access and disclosure of images to third parties

- There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police, and service providers to the Town Council where these would reasonably need access to the data (e.g. investigators).
- If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Town Council should seek expert advice from a Data Protection Officer in the first instance and appropriate legal advice may be required.
- The data may be used within the Town Council's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

9. Data protection impact assessments and privacy by design.

CCTV has the potential to be privacy intrusive. The Town Council will perform a privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

10. Policy Review

The Clerk and Responsible Officer is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

11. Links with other policies

This CCTV policy links with the Town Council's:

- Data Protection Policy
- Freedom of Information Policy
- Subject Access Request Policy
- Data Retention Policy
- Information Security Policy
- Data Breach Policy