

## Patchway Town Council

### CCTV Policy

#### 1. Introduction

This Policy is to control the management, operation, use and confidentiality of the CCTV systems at Callicroft House, Rodway Road (Patchway Fire Station) and Norman Scott Park.

It was prepared after taking due account of the Code of Practice published by the Data Protection Commissioner (revised 2008). This policy will be subject to periodic review by the Town Council to ensure that it continues to reflect the public interest and that it and the system meets all legislative requirements.

Patchway Town Council accepts the data protection principles based on the General Data Protection Regulation (GDPR) which became law on 25<sup>th</sup> May 2018 and will, like the Data Protection Act 1998 before them, seek to strike a balance between the rights of individuals and the sometimes, competing interests of those such as the Town Council with legitimate reasons for using personal information as follows:

The policy is based on the premise that Personal Data must be:

- Processed fairly, lawfully and in a transparent manner in relation to the data subject;
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- Accurate and, where necessary, kept up to date;
- Kept in a form that permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- Processed in a manner that ensures appropriate security of the personal data including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

#### 2. 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 reduce the fear of crime by persons using Town Council facilities, so they can enter and leave the buildings and facilities without fear of intimidation by individuals or groups;

Adopted: 10<sup>th</sup> May 2022.

Review: May 2023.

- To reduce the vandalism of property and to prevent, deter and detect crime and disorder;
- To assist the police, the Town Council and other Law Enforcement Agencies 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, both inside and outside Town Council buildings;
- To assist all 'emergency services' to carry out their lawful duties.

### **3. Changes to the Purpose or Policy**

A major change that would have a significant impact on either the purpose or this policy of operation of the CCTV scheme will take place only after discussion and resolution at full Council meeting. All agendas are posted on the Town Council website at least 3 clear days (excluding weekends) before Council meetings.

### **4. Responsibilities of the Owners of the Scheme**

The elected Town Council retains overall responsibility for the scheme.

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Review: May 2023.

**Patchway Town Council**  
**CCTV Code of Practice**

**Management of the System**

Day-to-day operational responsibility rests with the Clerk to the Council in conjunction with the Deputy Town Clerk/RFO. Maintenance is carried out by external contractors.

Breaches of this policy by operators will be investigated by the Clerk to the Council and reported to the Town Council.

A CCTV system prevents crime largely by increasing the risk of detection and prosecution of an offender. Any relevant tape or digital evidence must be in an acceptable format for use at Court hearings. This policy must be read and understood by all persons involved in this scheme and individual copies of this policy will therefore be issued for retention. A copy will also be available for reference in the secure recording areas.

**Control and Operation of the Cameras, Monitors and Systems.**

**The following points must be understood and strictly observed by operators:**

1. Trained operators must act with due probity and not abuse the equipment or change the pre-set criteria to compromise the privacy of an individual.
2. The position of cameras and monitors have been agreed following consultation with security consultants in order to comply with the needs of the public.
3. No public access will be allowed to the monitors except for lawful, proper and sufficient reason, with prior approval of the Clerk/Deputy Clerk to the Council. The Police are permitted access to tapes and prints if they have reason to believe that such access is necessary to investigate, detect or prevent crime. .
4. Operators should regularly check the accuracy of the date/time displayed. All sites have software installed so the display clock which will be updated automatically via the internet.
5. Digital records should be securely stored to comply with data protection and should only be handled by the essentially minimum number of persons. Digital images will be erased after a period of 28 days at all premises.
6. All access to CCTV images are password protected and have an automatic system log out after 5 minutes. The passwords of these systems are not permitted to be shared beyond to roles stipulated in this policy; the Town Clerk and the Deputy Town Clerk. Sharing a password beyond this group is considered a breach of this policy and could lead to disciplinary action.

Adopted: 10<sup>th</sup> May 2022.

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7. Images will not normally be supplied to the media, except on the advice of the police if it is deemed to be in the public interest. The Clerk to the Council would inform the Chair of the Council of any such action.
8. As records may be required as evidence at Court, each person handling a digital record may be required to make a statement to a police officer and sign an exhibit label. Any images that are handed to a police officer should be signed for by the police officer and information logged to identify the recording and showing the officer's name and police station. The log should also show when such information is returned to the Town Council by the police and the outcome of its use.
9. Any damage to equipment or malfunction discovered by an operator should be reported immediately to their line manager or contact made with the company responsible for maintenance, and the call logged showing the outcome. When a repair has been made this should also be logged showing the date and time of completion.
10. Any request by the police for access to CCTV images to identify a specific incident or an individual member of the public for access to their own recorded image must be made on an 'Access Request Form' with no charge. Forms are available from the Council Office and will be responded to within 30 days (see Appendix B).

### **Accountability**

Copies of the CCTV Policy are available in accordance with the Freedom of Information Act, as will any reports that are submitted to the Town Council *providing it does not breach security needs*. The Police will be informed of the installation and provided with a copy of this CCTV Policy. Any written concerns, complaints or compliments regarding the use of the system will be considered by the Town Council, in line with the existing complaints policy.

Patchway Town Council has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes.

***THIS POLICY MUST BE COMPLIED WITH AT ALL TIMES.***

*I have read the above policy and agree to abide by these instructions. I will discuss any concerns with the Clerk to the Council at any time.*

X

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Print Name

Date

Adopted: 10<sup>th</sup> May 2022.

Review: May 2023.

**Patchway Town Council  
Log of CCTV Incidents**

<b>Offence</b>	<b>Date/Time/Place Committed</b>	<b>Address/Description</b>	<b>Name/Address of Witness</b>	<b>Action taken (including Crime Ref. No.)</b>	<b>By</b>	<b>Date/Time</b>	<b>CCTV Checked By/Result/Action</b>

Adopted: 10<sup>th</sup> May 2022.  
Review: May 2023.

**Patchway Town Council**

**ACCESS REQUEST FORM – CCTV IMAGES**

<b>Date of Recording:</b>	<b>Place of Recording:</b>	<b>Time of Recording:</b>	
<b>Applicants Name and Address</b>		<b>Description of Applicant and any distinguishing features (e.g. clothing)</b>	
<b>Post Code:</b>	<b>Tel.No:</b>		
<b>Signature of Applicant</b> <b>(or parent/guardian if under 18)</b>		<b>A recent photograph may be necessary to aid identification.</b>	
<b>Reason for request - to be submitted to the Town Council.</b>			
<b>Continue overleaf if necessary</b>			
<b>Received by:</b>	<b>Clerk's Signature:</b>	<b>Date Received:</b>	<b>Time Received:</b>
<b>Fee Charged / N.A.</b>	<b>Fee Paid:</b>	<b>Request Approved:</b> <b>YES/NO</b>	<b>Date Applicant Informed:</b>

**Patchway Town Council  
CCTV System Annual Review**

This CCTV system and images produced by it are controlled by Patchway Town Council who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998)

Patchway Town Council has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes. The Town Council conducts an annual review of the use of CCTV on their premises.

	<b>Checked (Date)</b>	<b>By</b>	<b>Date of next review</b>
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system.			
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.			
Cameras have been sited so that they provide clear images.			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.			
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
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.			
Except for law enforcement bodies, images will not be provided to third parties.			
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.			

Adopted: 10<sup>th</sup> May 2022.  
Review: May 2023.

Regular checks are carried out to ensure that the system is working properly and produces high quality images.			
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**Please keep this checklist in a safe place until the date of the next review.**