

# **Winkfield Parish Council**

## **CCTV Policy**

Approved: 18<sup>th</sup> June 2024 (CM24/52)

Review by: June 2027

Version: 1.0

### **1. Purpose**

1.1 The purpose of this policy is to regulate the management, operation, and use of the CCTV (Closed Circuit Television) installations owned and operated by Winkfield Parish Council.

### **2. Legal Framework**

2.1 This Policy should be read with reference to the Data Protection Act 2018, Freedom of

Information Act 2000 (FOIA), the Protection of Freedoms Act 2012 (PFA), the Human Rights Act 1998 (HRA), the Home Office Surveillance Camera Code of Practice (SC code) and the Information Commissioner's Office (ICO) CCTV Code of Practice.

2.2 Winkfield Parish Council is registered with the Information Commissioners Office (ICO)

### **3. Location and identification**

3.1 CCTV is installed at the following Winkfield Parish Council locations:

- Ascot Jubilee Pavilion and Recreation Ground, North Ascot
- Carnation Hall, Winkfield Row
- Martins Heron & The Warren Community Centre, Martins Heron
- Locks Ride Pavilion (to be installed and operational by end August 2024)

3.2 The Parish Council will ensure prominent signs are in place. The signs will:

- Be clearly visible and legible.
- Advise that the area is covered by CCTV surveillance and that pictures are recorded.
- Contain contact details of Winkfield Parish Council
- Inform the purpose of using CCTV.

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

## **4. Purpose of the CCTV system**

4.1 Winkfield Parish Council use CCTV to provide a safer, more secure environment for its staff, councillors, visitors, and users of the Parish Council buildings. The camera is used for:

- Safeguarding the public, staff, and councillors
- Protecting Parish Council buildings and assets
- The prevention, investigation, and detection of crime
- Reduce anti-social behaviour.
- To monitor access to the building outside of office hours

4.2 The Parish Council does not use the CCTV system for covert monitoring.

## **5. Operation**

5.1 The camera operates 24 hours per day and for 365 days a year. A recording is taken, and a live feed is accessible at sites and in the Parish Office. Only authorised staff have access to the recordings and live feed.

5.2 The camera position is fixed and cannot be adjusted.

## **6. Authorised personnel**

6.1 The Parish Clerk is authorised to have live access and access to recorded information. The Parish Clerk may grant access as required to other authorised staff members.

6.2 The council system was installed by an IT specialist who maintains the system but does not have access to data.

## **7. Data retention and storage**

7.1 Recorded data will be stored for 30 days except where the image identifies an issue and is retained specifically in the context of an investigation / prosecution of that issue.

7.2 Data can only be accessed through an authorised device with a password.

## **8. Maintenance**

8.1 The CCTV system is maintained by the Parish Council and includes periodic maintenance inspections. Annual servicing of the system to ensure everything is fully functioning should be conducted by qualified personnel only.

8.2 Winkfield Parish Council is responsible for:

- Ensuring that it complies with its responsibilities in relation to guidance on the location of the camera.
- Ensuring that the date and time reference are accurate.
- Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- Ensuring that cameras are protected from vandalism to ensure that they remain in working order.

## **9. Access and disclosure of images to third parties**

9.1 Disclosure of the recorded images to third parties can only be authorised by the Data Controller. The Parish Clerk is duly authorised to act on behalf of the Data Controller.

9.2 There will be no disclosure of recorded data to third parties other than authorised personnel such as the Police.

9.3 If there are any concerns as to disclosure, then the Parish Council should seek expert advice e.g. from the ICO, and appropriate legal advice may be required.

9.4 All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented. Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

## **10. Subject Access Requests**

10.1 Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. If the Parish Council receives a Subject Access Request under the Data protection Act 2018 it will comply with requests within 1 month. The Council may charge a fee for the provision of a copy of images.

10.2 If the Council receives a request under the Freedom of Information Act 2000 it will comply with requests within 20 working days of receiving the request. As a rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data, and its disclosure is unlikely as a Freedom of Information request.

10.3 Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system e.g. time, date, and location. Requests for access should be addressed to the Data Controller.

10.4 Refusal to disclose images may be appropriate where its release is would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

## **11. Data protection impact assessments and privacy by design**

11.1 CCTV has the potential to be privacy intrusive. The Parish Council will perform a privacy Data Protection Impact Assessment (DPIA) when installing or moving CCTV cameras.

## **12. Policy review**

12.1 This policy will be subject to review every three years or if the council decides to change the way in which it uses CCTV.

### **Contact details:**

Data Controller: Winkfield Parish Council

Subject access requests should be made to:

Parish Clerk  
Winkfield Parish Council  
Council Offices  
Fernbank Road  
Ascot SL5 8JW