



Brixworth Parish Council

CCTV Policy

1.0 Background

Brixworth Parish Council uses Closed Circuit Television (CCTV) and its images for the prevention, identification, and reduction of crime and to monitor the St David's Recreation Ground and its facilities on Froxhill Crescent and St David's Close, in order to provide a safe and secure environment for all council members, council employees and members of the public, i.e. users of the recreation ground and its facilities.

1.2 CCTV Surveillance at this site is intended for the purpose of:

- Protecting the Council owned sports field, MUGA, play area and car park 24 hours a day, 7 days a week;
- Promoting the health and safety of staff, members and users;
- 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 all rules pertaining to the use of the sport pavilion and grounds are respected and can be managed properly.

1.3 The system comprises of 4 fixed cameras, which cover the MUGA, Sports field, play area and car park.

1.4 The CCTV system is owned and operated by Brixworth Parish Council and the deployment of which, is determined by the Clerk/RFO as Data Controller and subsequently full council.

1.5 The CCTV is monitored centrally from the Parish Council shed by two Data Controller's; - Parish Clerk – Josie Flavell - Admin Assistant – Gavin Kirk

1.6 The Council's CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the Council's use and how it complies with the Act.

1.7 All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to and disclosure of recorded images.

1.8 The Council complies with the Information Commissioner's Office (ICO) Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

1.9 The use of CCTV system will be conducted in a professional, ethical, and legal manner and any diversion of the use of CCTV security technologies for other purposes are prohibited by this policy, e.g., it will not be used to monitor members of the public without just cause.

1.10 Monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by Council, including Dignity at Work Policy, Code of Conduct, Bullying & Harassment and other relevant policies.

2.0 Justification for Use of CCTV

2.1 The use of CCTV to control for security purposes, has been deemed to be justified by full Council. The system is intended to capture images of intruders or of individuals damaging council owned property, or removing equipment without authorisation, or anti-social behaviour.

2.2 CCTV Systems will not be used to monitor sporting events/activities or employees at work.

3.0 Data Protection Impact Assessment

3.0 Where new CCTV systems or cameras are to be installed, Council will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may involve consultation with local residents/neighbouring properties.

4.0 Location of Cameras

4.0 Cameras will be sited so they can only capture images relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectation are not violated.

4.1 Council will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. Council has made every effort to position the cameras so that their coverage is restricted to council owned facilities only.

4.2 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Brixworth Parish Council has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals, with cameras in external areas being positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

4.3 CCTV video monitoring and recording of public areas may include:

- **Protection of council buildings and property;** The sports pavilion perimeter, entrances and exits, storage areas, car park and main gates.
- **Monitoring of access control systems:** Monitor and records restricted access areas at entrances to the sports building and other areas;
- **Criminal Investigations (carried out by Police):** Robbery, burglary and theft surveillance as well as anti-social behaviour.

5.0 Covert Surveillance

5.0 Brixworth Parish Council will not engage in covert surveillance.

6.0 Notification

6.0 A copy of this CCTV policy is available on request and is also available free of charge to download from the Parish Council website.

6.1 The location of the cameras will also be indicated via a plan, with adequate signage placed on and around the grounds of the Village Hall, to indicate that CCTV is in operation.

7.0 Storage and Retention of Images/Data

- 7.0 The images/data captured by the CCTV system will be retained for a maximum of 30 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.
- 7.1 The images/recordings will be stored in a secure environment with a log of access kept.
- 7.2 Access will be restricted to authorised personnel only. Supervising the access and maintenance of the CCTV system is the responsibility of the Parish Clerk, who may delegate the administration of the CCTV system to another Data Controller.
- 7.3 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

8.0 Access

- 8.0 Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.
- 8.1 Access to the CCTV system and stored images will be restricted to authorised personnel only (Parish Clerk and Councillor Data Controllers).
- 8.2 When accessing images two Data Controllers (Parish Clerk and Admin Assistant) must be present. A written record of access will be made. Records of access will also be kept.
- 8.3 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.
- 8.4 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.
- 8.5 In relevant circumstances, CCTV footage may be accessed:
 - By the Police where Brixworth Parish Council are required by law to make a report regarding the commission of a suspected crime; or
 - Following a request by the Police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Naseby Parish Council property, or;
 - To the HSE and/or any other statutory body charged with child safeguarding; or
 - To assist the Parish Clerk in establishing facts in cases of unacceptable behaviour, in which case, the individuals involved, will be informed; or
 - To data subjects (or their legal representatives), pursuant to a Subject Access Request or
 - To individuals (or their legal representatives) subject to a court order.
 - To the Parish Council insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

9.0 Subject Access Requests (SAR)

- 9.0 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 9.1 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time, and location.
- 9.2 Council will respond to requests within 30 calendar days of receiving the request in line with the council's right of access policy.
- 9.3 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.
- 9.4 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

- 9.5 In giving a person a copy of their data, Council will provide a still or series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released.
- 9.6 Where footage contains images relating to 3rd parties, Council will take appropriate steps to mask and protect the identities of those individuals.

10.0 Complaints

- 10.0 Complaints and enquiries about the operation of CCTV within should be directed to the Parish Clerk in the first instance.

11.0 Staff Training

- 11.1 Staff authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.
- 11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.
- 11.3 Staff misuse of surveillance system information will lead to disciplinary proceedings.

12.0 Responsibilities

- 12.0 The Parish Clerk will:
- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Brixworth Parish Council.
 - Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes.
 - Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
 - Ensure that the CCTV monitoring is consistent with the highest standards and protections
 - Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
 - Maintain a record of access (e.g., an access log) to or the release of tapes or any material recorded or stored in the system
 - Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
 - Give consideration to members of the public and council staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
 - Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the setting and be mindful that no such infringement is likely to take place
 - Co-operate with the Parish Clerk in reporting on the CCTV system in operation.
 - Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
 - Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
 - Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
 - Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
 - Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics

- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

Appendix 1

CCTV Monitoring Log

Anyone viewing CCTV footage, needs to have a second authorised person present and must complete this form.

Date	Time	Name	Name	Reason



St David's Recreation Ground CCTV

Data Protection Impact Assessment

This document explains how Brixworth Parish Council record their DPIA process and outcomes. It follows the process set out in the Information Commissioner Officer DPIA guidance and European guidelines on DPIAs.

Submitting controller details

Name of controller	Brixworth Parish Council
Subject/title of DPO	Local Authority
Data Protection Officer (Parish Council) Secondary Data Protection Officer	Josie Flavell – Parish Clerk Information Commissioners Office (ICO)

Step 1: Identify the need for a DPIA

To further protect community assets and the users of the facilities, Brixworth Parish Council have installed CCTV to deter crime, theft and anti-social behaviour. The CCTV system also allows the recording of such incidences to enable the Police and authorities to take legal action, such as prosecution.

The Data Impact Assessment is required due to the CCTV monitoring all users (general public) of the sports field, MUGA (multi use games area), car park and play area.

Step 2: Describe the processing

The CCTV system will be connected to the hub based inside the Parish Council shed adjacent to the Central Sports Pavilion and MUGA.

The recordings are collected via a wireless system and the data held remotely by Brixworth Parish Council for a maximum of 30 days only, at which point it will be deleted, unless it is required for legal purposes.

The data will only be shared with the Police and other relevant authorities, and members of public should they have a reasonable reason to request the data via a Subject Access Request form. Only data requested via this means will be allowed and only if the reason is valid.

Data will only be stored on a USB memory device, CDROM or other memory storage device should there be a need to share the data with the Police for legal reasons.

Describe the scope of the processing:

The CCTV system operates 24 hours a day, seven days a week and will therefore be transmitting/streaming data to the main hub within the Parish Council shed constantly. However, this data will only be stored for a maximum of 30 days unless otherwise required by the Police for prosecution reasons due to theft, criminal activity, or anti-social behavioural issues.

The data collected will involve recording all users and their use of the play equipment, the MUGA (multi use games area), car park and sports field.

The system is set up so as not to intrude on the privacy of any neighbouring private properties and will only record within those aforementioned parameters.

Those affected by the use of CCTV will be the general public i.e., all users of the St David's Recreation Ground facilities, which includes all age ranges.

Describe the context of the processing:

The Parish Council's relationship to those using the St David's Recreation Ground facilities, is as their local authority for the parish.

The general public will have no control over the use of the CCTV and can only submit a Subject Access Request for data/footage/images from the system for a reasonable and valid reason, and which the Parish Council deem necessary, due to the Data Protection Act 2018, General Data Protection and safeguarding regulations.

Due to the nature of the facilities, children and adults of all ages, including vulnerable individuals may be recorded. However, the Parish Council adhere to all regulations as set out by central Government and law, and are also signed up to the Information Commissioner Office (ICO) scheme concerning data protection and its use.

As owners of the St David's Recreation Ground and the aforementioned facilities, Council felt it prudent to install CCTV to ensure the safety and security of all its users and its assets, along with those owned by various sporting clubs who utilise the grounds and its facilities.

Brixworth Parish Council will only use data recordings for legal purposes and will not share the data with anyone outside of its remit, the Police or other relevant authorities unless absolutely necessary, and where there is a reasonable request to do so.

All shared data will ensure the privacy of those made visible by the recording, by blurring out/obscuring all individuals with the exception of the perpetrator/s, to protect their identity.

Describe the purposes of the processing:

The Parish Council want to ensure the safety and security of all users of the St David's Recreation Ground and its facilities.

The benefit to processing this data allows the authorities such as the Police to clearly identify any individuals involved in anti-social behaviour, theft, burglary, or any other crime, and to apprehend them.

It also allows the general public to feel safe in the knowledge that should a criminal act take place, in particular towards a person or minor, there will be footage of the incident to enable the Police to take reasonable and appropriate action.

Step 3: Consultation process

Consider how to consult with relevant stakeholders:

The CCTV system was subject to several Council discussions via monthly meetings for several months prior to its installation, allowing members of public the chance to state their views.

Records of this are available via the Parish Council agendas and minutes on its website.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular:

The system, will ensure the safety and security of all its assets and users of St David's Recreation Ground.

Brixworth Parish Council are fully compliant with all laws and regulations surrounding the CCTV system and its use, with the Proper Officer (Clerk) acting as the main data controller on behalf of council and the Admin Assistant acting as a secondary data controller.

The data will held securely and again, will not be used or viewed unless there is a reasonable reason to do so.

The Clerk and Admin Assistant will adhere to the same rules, laws, and schemes as the Parish Council and will ensure the system is run in accordance with the aforementioned.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Theft of equipment	Possible and probable	Minimal	Low with CCTV
Misuse of equipment by users	Possible and probable	Minimal to significant	Low to medium
Physical harm to users, in particular minors Whilst using equipment	Possible	Minimal to severe	Low to High
Physical harm to users, in particular minors, by other users, i.e. members of public	Remote to Possible	Minimal to severe	Low to high
Anti-social behaviour	Probable	Significant	Medium

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Anti-social behaviour	CCTV in operation	Reduced to eliminated	Low	Yes
Theft of equipment	CCTV in operation	Reduced to eliminated	Low	
Misuse of equipment by users	CCTV in operation	Reduced to eliminated	Low	
Physical harm to users, in particular minors whilst using equipment	CCTV in operation	Reduced to eliminated	Low	
Physical harm to users, in particular minors, by other users, i.e. members of public	CCTV in operation	Reduced to eliminated	Low	

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Brixworth Parish Council (full council)	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Brixworth Parish Council (full council)	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Yes	DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>Summary of DPO advice:</p> <p>The DPO has advised all areas meet with current compliance and processing of data can take place in line with Council's DPIA and CCTV Policy.</p>		
DPO advice accepted by:	Accepted Date: 29/06/2023	If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:	The Data Controller – Parish Clerk	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	The Parish Clerk every 12 months and will ensure compliance is maintained on an ongoing basis.	The DPO should also review ongoing compliance with DPIA



CCTV Subject Access Request Form

Should a member of public request to view CCTV footage/data, the request needs to be made in writing using the below form and then emailed to the CCTV Data Controller (Parish Clerk) at the following address: parish.clerk@brixworthparishcouncil.gov.uk

Requests must include the date, time, and location where the CCTV image was recorded. ID may be required.

Brixworth Parish Council aims to respond promptly and at the latest within one month of receiving a valid request.

Title (tick ✓ box)	Mr	<input type="checkbox"/>	Mrs	<input type="checkbox"/>	Miss	<input type="checkbox"/>	Dr.	<input type="checkbox"/>	Other	<input type="checkbox"/>
First Name	<input type="text"/>									
Last Name	<input type="text"/>									
Address	<input type="text"/>									
	<input type="text"/>									
	<input type="text"/>									
County	<input type="text"/>									
Postcode	<input type="text"/>									
Email Address	<input type="text"/>									
Phone/Mobile Number	<input type="text"/>									

Date of Request	<input type="text"/>
Date of Incident	<input type="text"/>
Time of Incident	<input type="text"/>
Description of Incident (inc. what happened, description of yourself, and the location)	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
	<input type="text"/>
Reason for Request	<input type="text"/>
	<input type="text"/>

View Images ✓	<input type="checkbox"/>	Request a Copy ✓	<input type="checkbox"/>
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