

## 1.0 Introduction

- 1.1 Warfield Parish Council has installed a limited CCTV system at the Brownlow Hall for specific purposes. This policy is based upon the 12 guiding principles set out in the Surveillance Camera Code of Practice 2022 issued by the Biometrics and Surveillance Camera Commissioner.

## 2.0 Guiding Principles

- 2.1 The council has adopted the following 12 guiding principles:

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 user 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.

### **3.0 Legal Framework**

- 3.1 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 Surveillance Camera Code of Practice (SC code) and the Information Commissioner's Office (ICO) CCTV Code of Practice.

### **4.0 Location and identification**

- 4.1 The council operates one CCTV camera. The camera is located within the main lobby of the Brownlow Hall and provides coverage of the main door, part of the lobby and part of the rear car park.
- 4.2 In the entrance to the Brownlow Hall, the parish council will ensure prominent signs are in place. The signs will:
  - Be clearly visible and legible.
  - Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme (Privacy statement).

### **5.0 Purpose of the CCTV system**

- 5.1 Warfield Parish Council use CCTV to provide a safer, more secure environment for its staff, councillors, visitors, and users of the Brownlow Hall. The camera is used for:

- Safeguarding the public, staff, and councillors
- Monitoring security of the site
- To identify visitors to the Parish Office
- The prevention, investigation, and detection of crime
- To monitor access to the building outside of office hours

5.2 The parish council does not use the CCTV system for covert monitoring.

## **6.0 Operation**

6.1 The camera operates 24 hours per day and for 365 days a year. A recording is taken and a live feed is accessible in the Parish Office during operating hours or via an app on mobile devices. Only authorised staff have access to the app.

6.2 The camera position is fixed and cannot be adjusted.

## **7.0 Authorised personnel**

7.1 The Parish Clerk is authorised to have live access and access to recorded information. The Parish Clerk may grant access as required to other staff members and will keep a record of any access granted.

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

## **8.0 Data retention**

8.1 Recorded data will be stored for 30 days. Data can only be accessed through an authorised device with a password.

## **9.0 Maintenance**

9.1 The CCTV system is maintained by the parish council and includes periodic maintenance inspections.

9.2 Warfield 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 in order to ensure that they remain in working order.

## **10.0 Disclosure**

- 10.1 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.
- 10.2 Disclosure will only be granted:
- If its release is fair to all individuals concerned.
  - If there is an overriding legal obligation (e.g., information access rights).
  - If it is consistent with the purpose for which the system was established.
- 10.3 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.

## **11.0 Subject Access Requests**

- 11.1 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.
- 11.2 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.
- 11.3 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. Requests for access should be addressed to the Data Controller.
- 11.4 Refusal to disclose images may be appropriate where its release is:
- Likely to cause substantial and unwarranted damage to that individual.
  - To prevent automated decisions from being taken in relation to that individual.

## **12.0 Monitoring and evaluation**

- 12.1 The parish council will undertake regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:
- Its stated purpose.

- The location.
- The images recorded.
- Storage length.
- Deletion.

### 13.0 Policy review

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

<b>Data Controller</b>	Warfield Parish Council
<b>Subject access requests should be made to:</b>	Parish Clerk Warfield Parish Clerk Brownlow Hall Newell Green Warfield RG42 6AB

