



CCTV Policy

Policy and Finance Committee Approved: 17th May 2023
Due for next Review: 17th May 2026

1. Purpose

The purpose of this document is to outline the conditions for the use of CCTV cameras and electronic portable recording equipment by Fleet Town Council.

The use of CCTV will be undertaken in accordance with the Data Protection Act 2018.

2. Objectives

This CCTV Policy explains how Fleet Town Council will operate its CCTV equipment and comply with the current legislation.

Fleet Town Council uses CCTV equipment to provide a safer, more secure environment for its staff, volunteers, and service users and to combat vandalism and theft.

CCTV is installed for the purpose of:

- staff, public and premise security, and safeguarding on Fleet Town Council land and premises.
- the prevention, investigation, and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Monitoring the security of the sites.
- To improve public safety and re-assure the public.
- To collect evident for the purpose of criminal and civil litigation by the policy with a responsibility for enforcing law, licensing, and regulation.
- To alert the emergency services when required of actual or potential incidents.

3. Operation

In order to comply with the requirements of the law, data will be:

- Fairly and lawfully processed.
- Processed for limited purposes and not in a manner incompatible with those purposes.

- Adequate, relevant, and not excessive
- Accurate
- Not kept for longer than is necessary.
- Processed in accordance with individuals' rights.
- Secure
- Clear signage will be placed in the immediate vicinity of the area being monitored. The signs will be clearly visible and legible. They will contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme. They will be in appropriate size depending on context.
- Cameras will not be installed in a covert manner.

4. Location

Cameras are in those areas where it has been identified there is a need and where other solutions are ineffective. The CCTV system is used solely for the purpose(s) identified and is not used to routinely monitor staff, volunteers or service users conduct.

Cameras will not be installed in the following areas:

- Toilets, Changing/Shower facilities, or Baby changing areas.
- Dressing or changing room facilities or any area designated to be an area requiring privacy.
- Cameras will not be located where they will affect an individual's rights.
- Static cameras will not focus on private homes, gardens, and other areas of private property.

5. Maintenance

The CCTV system is maintained by Fleet Town Council and includes periodic maintenance inspections.

Fleet Town Council is responsible for:

- Ensuring that it complies with its responsibilities in relation to guidance on location of the camera. A detailed log will be kept by the Executive Officer/ Data Protection Officer to identify the location of each 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 the Data Protection Officer is trained in the use of the equipment.
- Ensuring that cameras are protected from vandalism to ensure that they remain in working order.
- Ensuring that appropriate signage is in place, clear and legible.

6. Retention of Images

Images from cameras are recorded on a secure hard drive (??) (“the recordings”). Where recordings are retained for the purposes of security of staff and premises, these will be held in secure storage, and access controlled. Recordings which are not required for the purposes of security of staff and premises will not be retained for longer than is necessary.

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified.

The system does not have an automatic power backup facility in the event of a main power supply failure.

Fleet Town Council reserves the right to use images captured on CCTV where there is activity that cannot be expected to be ignored such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. The Data Protection Officer (“DPO”) will retain images for evidential purposes in a locked area. Where images are retained, the DPO will ensure the reason for its retention is records, where it is kept, any use made of the images and finally when it is destroyed.

Fleet Town Council ensures that images are not retained for longer than is necessary. Once the retention period has expired, images are removed or erased.

7. Access to images and Subject Access Requests

It is important that access to and disclosure of images recorded by CCTV and similar surveillance equipment is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes.

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 Fleet Town Council receive a Subject Access Request under GDPR 2018 it will comply with the requests within 1 month. 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.

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.

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 that individual.

Viewing of images must be documented as follows:

- The name of the person removing from secure storage, or otherwise accessing the recordings.
- The date and time of removal of the recordings.
- The name(s) of the person(s) viewing the images (including the names and organisations of any third parties).
- The reason for the viewing.
- The outcome, if any, of the viewing.
- The data and time of replacement of the recordings.
- Any crime incident number to which the images may be relevant, if applicable.
- The place to which the recordings will be taken, if applicable.
- The signature of the collecting police officer, if applicable.

8. Monitoring and Evaluation

Fleet Town Council undertakes regular audits to ensure that the use of CCTV continues to be justified. The audit includes a review of:

- Impact assessment forms are completed for each camera.
- Its stated purpose.
- The location.
- The images recorded.
- Storage length.
- Deletion.

9. Review

This policy will be reviewed biennially by Fleet Town Council. If the Council decides to change the way it uses CCTV it will inform the Information Commissioner within 28 days.

If the way the Council uses CCTV is to change due to changes to buildings, impact assessment forms will be completed to ensure that CCTV remains relevant for the locations recorded and purposes given.

10. Home Office Surveillance Camera Guiding Principles

System operators should adopt 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 use 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 s system and its purpose and work to meet and maintain those standards.
9. Surveillance camera systems 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.