



Felpham Community Hall

CCTV Policy

Adopted: August 2021

Review: August 2023

1. A Closed Circuit Television (CCTV) System is in place Felpham Community Hall. This system, known as the 'CCTV System', comprises a number of cameras installed at strategic locations. All of the cameras are fully operational and recorded.
2. For the purpose of this policy, the 'Owner' of the system is Felpham Parish Council.
3. For the purposes of the Data Protection Act, the 'Data Controller' is Felpham Parish Council.
4. This policy will be subject to review periodically, but at least biennially, to include consultation with interested parties.
5. Throughout this policy it is intended, as far as possible, to balance the objectives of the CCTV System with the need to safeguard the individual's rights. Every effort has been made throughout this policy to indicate that a formal structure has been put in to place, including a complaints procedure.

Objectives of this policy

The objectives of the CCTV System which form the lawful basis for the processing of data are:

6. To protect the health and safety of Hall staff, elected members and visitors
7. To protect the Hall and the Council's assets.
8. To detect, prevent and reduce incidence of property crime, public disorder and offences against people.
9. To support the police in a bid to deter and detect crime, identify, apprehend and prosecute offenders.
10. To protect members of the public and private property.
11. To satisfy the requirements of our insurers.

Principles

12. The CCTV System is registered with the Information Commissioner under the terms of the Data Protection Act 2018.

13. The CCTV System is operated in accordance with the Data Protection Act 2018 and the Information Commissioner's Code of Practice at all times.
14. The CCTV System is operated in accordance with all the requirements and the principles of the Human Right Act 1998.
15. The CCTV System is operated fairly, within the law, and only for the purposes for which it was established and is identified within this policy.
16. The public interest in the operation of the system is recognised by ensuring the security and integrity of operational procedures.

Key Personnel and Responsibilities

17. The Parish Clerk is the overall manager of the CCTV System and the person responsible for ensuring the objectives and principles set out in this policy are upheld.
18. The Parish Clerk has day-to-day responsibility for the monitoring, operation and evaluation of the CCTV System and the implementation of this policy and is also responsible for maintaining full management information as to the incidents dealt with in the management of the CCTV System.
19. The installation supplier provides day-to-day support for maintenance of the CCTV system.

Cameras and Area Coverage

20. The areas covered by CCTV to which this policy refers are the buildings and grounds of Felpham Community Hall.
21. Unless an immediate response to events is required or unless instructed to by the Police cameras are not to be directed at an individual, their property or a specific group of individuals, without authorisation from the Parish Clerk.
22. None of the cameras forming part of the system are installed in a covert manner.

Monitoring Equipment

23. A monitor is installed behind the counter in the Hall Office. The equipment has the capability of monitoring all cameras simultaneously throughout every 24-hour period.

24. The CCTV System records the images from all cameras in real time.
25. Access to the cameras, operating controls, recording and reviewing equipment is strictly limited to:
 - Authorised and trained staff during working hours.
 - Members of the installation supplier for support to the system.
26. Any authorised person operating the cameras acts with utmost integrity at all times.
27. Any replay of pre-recorded data is only undertaken in the Hall Office or via the secure app by the Parish Clerk only.
28. There must be a good reason for the viewing. A log of the playback is retained on file by the Parish Clerk, together with details of the purpose and those present at the viewing.
29. Access to pre-recorded data is strictly limited to the Parish Clerk and installation supplier.
30. Unauthorised persons do not have access to any part of the CCTV System without the authorisation of the Parish Clerk.

Privacy and Data Protection

31. All personal data obtained by virtue of the system, is processed fairly and lawfully and, in particular, only processed in the exercise of achieving the stated objectives of the CCTV System. In processing personal data, there is total respect for everyone's right to privacy.
32. The storage and security of the data will be strictly in accordance with the requirements of the Data Protection Act 2018, the Information Commissioner's Code of Practice and the Parish Council's Data Protection Policy.
33. All data is processed in accordance with the principles of the Data Protection Act, 2018, which, in summarised form, includes, but is not limited to:
 - All personal data is obtained and processed fairly and lawfully.
 - Personal data is held only for the purposes specified.

- Personal data is disclosed only to the people listed within this policy.
 - Only personal data is held that is adequate, relevant and not excessive in relation to the purpose it is held.
 - Steps will be taken to ensure personal data is accurate and where necessary, kept up to date.
 - Personal data is held no longer than necessary.
 - Individuals are allowed access to information held about them and, where appropriate, permitted to correct or erase it.
34. Security measures are in place to prevent unauthorised or accidental access to, alteration, disclosure, or loss and destruction of information.

Operation of the System by the Police

35. Under certain circumstances the Police may make a request to assume direction of the CCTV System. Only written requests made under section 29 of the Data Protection Act 2018 will be considered. Any such request will only be accommodated on the authority of the Parish Clerk.
36. In the event of such a request being permitted, only those CCTV operators who are authorised to do so will operate the CCTV System under the direction of the police officer.

Maintenance of the CCTV System

37. Provision is made for regular/periodic service checks of the CCTV equipment, which includes cleaning of any all-weather domes or housings, checks on the functioning of the equipment, and any minor adjustments that need to be made to the equipment settings to maintain picture quality.
38. The installation supplier takes full responsibility for all technical hardware aspects of the CCTV system. Should a fault develop all cameras, servers, switches and computers have maintenance and warranty agreements in place.

Handling of recorded material

39. For the purposes of this policy 'recorded material' means any material recorded by, or as the result of, technical equipment which forms part of the CCTV system, but specifically includes images recorded digitally, on hard drive and by way of DVD copying, including digital video prints.
40. Subject to the equipment functioning correctly, images from the cameras are recorded throughout every 24-hour period.
41. Recorded footage is overwritten after a period of 12 days.
42. Every digital recording obtained by using the CCTV System has the potential of containing recorded material, which may have to be admitted in evidence at some point during its life span. Irrespective of the format (e.g. DVD, paper copy, etc.), images obtained from the CCTV system are treated strictly in accordance with this policy from the moment they are received until their final destruction.
43. Access to, and the use of, recorded material is strictly for the purposes defined in this policy.
44. Recorded material is not copied, sold, or used for commercial purposes or the provision of entertainment.
45. A video print is a copy of an image or images, which already exists on a hard drive or DVD. Video prints are not taken as a matter of routine. The Parish Clerk must authorise any requests to make video prints from the CCTV System. There must be a good reason for the request. If a video print is made, the purpose of the request is recorded. The record will include brief details of the nature of the incident together with the location, time and date.
46. If a video print is required in connection with a criminal investigation, it is treated as an exhibit and dealt with in accordance with the rules of evidence in respect of continuity, disclosure, etc.

Copyright

47. Copyright and ownership of all material recorded by virtue of the CCTV System remains with the Data Controller.

Access to 'Personal Data'

48. The Data Protection Act 2018 provides Data Subjects (individuals to whom 'personal data' relate) with a right to data held about themselves, including those obtained by CCTV. Request for access should be made in writing to the Parish Clerk.

Public Information

49. A copy of this policy is made available on request.
50. Warning signs are in place at access routes to the Hall areas covered by the CCTV system. The signs indicate the presence of 24-hour CCTV monitoring.

Complaints

51. Any complaints about the CCTV System should be addressed to the Parish Clerk.

Breaches of this policy

52. Any breach of this policy is initially investigated by the Parish Clerk, in order for the appropriate action to be taken.