



Bollington

TOWN COUNCIL

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CCTV Code of Practice and Policy

This CCTV Code of Practice and Policy was adopted by the Council at its meeting held on 7th February 2023.

This version of the CCTV Code of Practice and Policy supersedes any previous versions.

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Table 1 Document Version Control

Version	Date	Initials	Comment
00.01_2022	06/10/2022	HW	Policy revised from previous CCTV Code of Practice
01.00_2023	07/02/23	HW	Approved by Personnel, Policy & Governance Committee on 11/01/23. Adopted by Full Council on 07/02/23.

Date of next review – Quarter 2 2024

1. Introduction

This Code of Practice and Policy applies to closed circuit television surveillance (CCTV) at Bollington Town Hall and Bollington Civic Hall.

Cameras are placed on the exterior of both buildings for the purposes of public safety, crime prevention/detection and prosecution of offenders.

The use of CCTV promotes public confidence by developing a safe and secure environment for the benefit of those employed, visiting or using the facilities of the buildings covered by the Bollington Town Council closed circuit television surveillance systems.

Bollington Town Council is committed to the recommendations contained in the Information Commissioners CCTV Code of Practice that can be found on the ICO website www.ico.gov.uk

This document details the management, administration and operation of the CCTV system owned by Bollington Town Council.

2. Code of Practice

2.1. Ownership

Bollington Town Council is the Data Controller responsible for the management, administration and security of the system.

Bollington Town Council will ensure the protection of individuals and the public by complying with the Code of Practice.

2.2. Code of Practice Statement

To ensure that all public area CCTV systems are operated in a manner that will secure their consistent effectiveness and preserve the civil liberty of law-abiding citizens at all times.

There are 12 guiding principles of the [Surveillance Systems Code of Practise](#):

- 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.
- 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.
- 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.
- There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.

- 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.
- 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.
- 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.
- 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.
- Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
- 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.
- 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.
- 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.

2.3. Objectives of the CCTV scheme

The following objectives have been identified:

- To help reduce the fear of crime
- To help deter crime
- To aid the detection of crime and prosecution of offenders
- To reduce instances of nuisance and vandalism
- To assist in the safety and wellbeing of the public

Existing cameras have been sited to capture images that serve the objectives as identified above.

2.4. CCTV Management

Prior to the installation of new cameras an 'Impact Assessment' will be to determine whether CCTV is justified and how it will be operated will be undertaken in compliance with the Surveillance Camera Commissioner's CCTV Code of Practice.

The CCTV systems will be operated fairly, within the applicable law and only for the purposes for which it is established or which are subsequently agreed in accordance with the Code of Practice.

Operators are aware of the purposes for which the CCTV systems have been installed and that the CCTV equipment is only used for the identified purposes.

CCTV systems will be operated with due regard for the privacy of individuals.

The CCTV systems will only be operated by trained and authorised Council staff.

2.5. Signage

The CCTV systems provide surveillance of the public areas outside the Town Hall and Civic Hall.

The areas protected by CCTV will be indicated by the presence of signs. The signs will be placed so that the public are aware that they are entering a zone which is covered by surveillance equipment. The signs will state the organisation responsible for the scheme, the purposes of the scheme and a contact telephone number.

2.6. Release of information

Images will be released to the police in pursuance of a crime or suspected crime and to insurance companies (if authorised) in pursuance of an insurance claim.

Individuals may request to view information concerning themselves in accordance with the Data Protection Act 2018.

If a request for images is received via the Freedom of Information Act and the person requesting the images is the subject, these will be exempt from the FOIA and will be dealt with under The Data Protection Act 2018.

Requests not involving identification of individuals can be disclosed but only if it does not breach the data protection principles.

3. System description

3.1. Town Hall

The CCTV system is comprised of several externally mounted cameras:

- Camera 1: Front. Overlooks the Town Hall car park and the extent of the public footway at its curtilage.
- Camera 2: Side. Overlooks the Council owned garage and driveway and the steps into the wooded bank.
- Camera 3: Rear door. Overlooks the Town Hall rear door, access ramp and the steps into the wooded bank.
- Camera 4: Rear right. Overlooks the back yard of the Town Hall and side kitchen window.

- Camera 5: Road. Mounted on Brookbank House. Overlooks two of the Council parking spaces in the Town Hall car park and Wellington Road running in front of the car park.

The cameras are activated by motion. All images are recorded digitally from camera source to a recording device located in a lockable room in the Town Hall. Images are retained for at least 30 days, with the oldest data overwritten as disk capacity is reached. Images will be retained for longer if they are expected to be used as evidence in an investigation.

3.2. Civic Hall

The CCTV system is comprised of several externally mounted cameras:

- Camera 1: Entry door. Overlooks upper steps and walkway to main entrance.
- Camera 2: Kitchen. Overlooks exterior of kitchen door and walkway leading to it.
- Camera 3: Near side. Overlooks the pathway at the side of the building that leads to the plant room.
- Camera 4: Rear. Overlooks the pathway and bank at the rear of the building.
- Camera 5: Far side. Overlooks the steps leading to and from the car park to the fire exit at the side of the hall.
- Camera 6: Library. Overlooks the covered area at the front of the library including the doorway and part of the disabled parking bay.
- Camera 7: Road. Overlooks the junction of Hurst Lane and Palmerston Street including the junction of Round Gardens with Palmerston Street.

The cameras are activated by motion. All images are recorded digitally from camera source to a recording device located in a lockable room in the Town Hall. Images are retained for at least 30 days, with the oldest data overwritten as disk capacity is reached. Images will be retained for longer if they are expected to be used as evidence in an investigation.

4. CCTV Policy

4.1. Introduction

The purpose of the policy is to regulate the management and use of the CCTV systems operated by Bollington Town Council.

The CCTV systems are owned wholly by Bollington Town Council.

Cameras will not be monitored in real time but rather recordings will be viewed retrospectively where the need arises.

The recordings are held on hard drive systems which are password protected and kept in secure locked locations.

This policy will be subject to regular review, which will include a review in respect of the effectiveness and necessity of the system.

4.2. Statement of Intent

The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements of the Data Protection Act and the Commissioner's Code of Practice, as well as the Surveillance Camera Code of Practice published by the Home Office.

Bollington Town Council will treat as data all CCTV recordings and relevant information.

Cameras will be used to record activities within the Council's property and its grounds in line with the objectives of the scheme.

Static cameras are set as to not focus on private homes, gardens and other areas of private property.

Materials or knowledge secured as a result of CCTV will not be released to the media, or used for any commercial purpose, or for the purpose of entertainment. Recordings will only be released at the request of the Police, insurance company where the request has been validated or in respect of a subject access request.

The planning and design has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency. It is not possible, however, to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the Council's CCTV.

4.3. Right to Privacy

Bollington Town Council supports an individual's right to privacy and that the use of CCTV systems does not infringe on that right.

CCTV monitors and recording systems are located in locked rooms with the screens powered off.

4.4. Operation of the system

The system will be administered by the Town Clerk and other Council staff only, in accordance with the principles and objectives expressed in the code.

The CCTV system will be in operation 24 hours each day, for every day of the year.

The system will be regularly serviced and maintained. Defects will be reported to the servicing company at the earliest convenient opportunity.

4.5. Control of software & access to the system

Access to the CCTV software will be strictly limited to authorised staff with a password.

Staff must satisfy themselves that all persons viewing CCTV material will have a right to do so.

The main recording equipment must be kept secure.

Other administrative functions will include controlling and maintaining downloaded digital materials, and maintenance and system access logs.

4.6. Procedure for the release of images

Recorded materials may be viewed by authorised operators investigating an incident.

Images (stills and footage) may be viewed by the Police for the detection of crime.

A record will be maintained of the release of images to the Police or other authorised applicants. A register will be available for this purpose.

Viewing of images by the Police must be recorded in writing and in the log book. Requests by the Police are allowable under section 29 of the Data Protection Act (DPA) 2018.

Should images be required as evidence, a digital copy may be released to the Police. USB Hard Drives and or other mass storage devices must be supplied by the Police.

Images stored on removable devices will be encrypted and can only be played back with the relevant media software player.

The Police may require the Council to retain images for possible use as evidence in the future. Such images will be securely stored until they are needed by the Police.

Applications received from outside bodies to view or release images will be referred to the Town Clerk. In these circumstances, images will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order.

Retention: Images will be retained for only as long as these are required. The system will automatically delete all recordings held on the main control unit, with recordings kept for at least one month.

4.7. Subject access and freedom of information

The Data Protection Act (DPA) 2018 provides Data Subjects (individuals to whom "personal data" relates) with a right to access data held about themselves, including those obtained by CCTV.

Requests for Subject Access should be made in writing to the Town Clerk

A request under the Freedom of Information Act 2000 will be accepted, where such a request is appropriate

Advice should be sought by the Clerk from the DPO before responding to a subject access or FOI request.

Care will be taken to ensure the release of data complies with current regulations and does not effect the rights and freedoms of other individuals.

4.8. Breaches of the code (including breaches of security)

Any breach of the CCTV Code of Practice and Policy will be investigated by the Town Clerk, in order for him/her to take any appropriate disciplinary action

4.9. Complaints

A member of the public wishing to make a complaint about the system may do so to the Town Clerk.

4.10. Points of contact

Town Clerk

clerk@bollington-tc.gov.uk

01625 572985

DPO

JDH Business Services Ltd