



Horton Kirby & South Darenth Parish Council **CCTV Policy**

Introduction:

The Parish Council uses closed circuit television (CCTV) and the images produced to prevent or detect crime to Heathside and surrounding area, including the Play Area, The Village Hall and Car Park, Westminster Field Pavilion and Car Park: in order to provide a safe and secure environment for its users, residents, and visitors and to prevent loss or damage to property and surrounds. This policy outlines the Parish Council's use of CCTV and how it complies with the General Data Protection Regulation; it is to be read in conjunction to the Parish Council's data protection policy.

The system comprises a number of fixed and moveable Hi-Definition Colour cameras with night-time infra-red capability.

The system is not linked to automated facial recognition software thus all individuals' images are anonymous until viewed.

The CCTV system is owned and operated by the Parish Council, the deployment of which is determined by the Parish Council.

The CCTV is monitored securely from the Parish Council Office and at the Pavilion Westminster Field. The server stores the images and is retained on-site. Access to the images is controlled by the Parish Clerk and is password protected.

The introduction of, or changes to, CCTV monitoring will be subject to consultation with members of the Parish Council.

All authorised operators with access to images are aware of these procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV policy. The 'Data Controller' (Parish Clerk) will ensure that all Councillors and staff are aware of the restrictions in relation to access to and disclosure of, recorded images by publication of this policy.

Statement of Intent:

The Parish Council complies and is registered with, the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at:

The Parish Council's CCTV cameras are linked to live recording devices which can be monitored by authorised personnel either on a video monitor or mobile phone. The images can be monitored live or via play-back from recordings. They are not linked to automated facial or number plate recognition software.

CCTV warning signs are clearly and prominently placed at the main external entrance to the Village Hall and Pavilion, Westminster Field, including further signage in other outdoor areas in close proximity to camera positions. Signs will contain details of the purpose for using CCTV. In areas where CCTV is used, the Parish Council ensures prominent signs are placed within the controlled area.

The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Siting the Cameras:

Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated.

The Parish Council will make every effort to position cameras so that their coverage is restricted to the Parish Council premises, which includes outdoor/indoor areas. The system design is sympathetic to the privacy of surrounding public and does not monitor public space outside the legitimate areas of interest for the Parish Council.

Storage and Retention of CCTV images:

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

All retained data will be stored securely at all times and permanently deleted as appropriate / required.

Recorded images will be kept for no longer than 3 months, except where there is lawful reason for doing so. Images are deleted from both the server and back-up server.

Access to CCTV images:

Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available. Named staff as of April 2024 Ms LJ Johnson, Clerk and one other Councillor. Access to stored images will only be granted in the case of an incident. To be viewed in the course of the incident's investigation.

Subject Access Requests (SAR):

Individuals have the right to request access to CCTV footage that constitutes their personal data unless an exemption applies the General Data Protection Regulations.

All requests should be made in writing to the Parish Council Clerk. 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.

The Parish Council will respond to requests within 28 days of receiving the written request and any fee where disproportionate effort is required to adhere to the request.

Disclosure of information from surveillance systems must be controlled and consistent with the purpose(s) for which the system was established. When disclosing surveillance images of individuals, particularly when responding to subject access requests, the Parish Council will consider whether the identifying features of any of the other individuals in the image need to be obscured. In most cases the privacy intrusion to third party individuals will be minimal and obscuring images will not be required. However, consideration will be given to the nature and context of the footage.

The subject will be supplied with a copy of the information in a permanent form. There are limited circumstances where this obligation does not apply. The first is where the data subject agrees to receive their information in another way, such as by viewing the footage. The second is where the supply of a copy in a permanent form is not possible or would involve disproportionate effort, whereby the disproportionate effort may incur an administration fee, charged on an hourly rate.

Access to and Disclosure of Images to Third Parties:

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police where these would reasonably need access to the data (e.g., investigators).

Requests for images and data should be made in writing to the Parish Council Clerk.

The data may be used within the Parish Council's discipline and grievance procedures as required and will be subject to the usual confidentiality requirements of those procedures.

Data transfer will be made securely and using encryption as appropriate.

Complaints:

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

First adopted: Date 8th April 2024 Minute 225 Next Review: April 2025