



CCTV POLICY

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Introduction

The purpose of this policy is to ensure that CTC complies with legal requirements for CCTV use, in compliance with the Information Commissioner's Office Code of Practice and relevant legislation including:

- the Data Protection Act 2018
- Human Rights Act 1998
- Surveillance Camera Code of Practice
- Protection of Freedoms Act 2012

Any surveillance camera captures personal data, so the use of CCTV has data protection and privacy implications. Before installation, CTC considered less intrusive methods of addressing the need, however, CTC concluded that the only way to address possible issues is through the use of CCTV.

Policy Statement

CTC use CCTV to support the safety and security of our employees and assets, including:

- The Town Hall
- Enfield Park Play Areas and Market Place
- The Old Cattle Market Skate Park Plaza

The Town Hall

CCTV will be used to act as a deterrent to intruders and to theft or misuse of property or information. It will also be used as a deterrent to improper or aggressive behaviour towards employees and Councillors of CTC. It will also be used to provide evidence to support the investigation of safety and security related incidents. Cameras are sited so that they are secure and protected from vandalism.

Enfield Park and Market Place (bandstand)

CCTV and appropriate lighting will be used to act as a deterrent to antisocial behaviour (including vandalism, drug use, violation of Enfield Park bylaws) which may adversely affect the park facilities including the play areas and mural. It will also be used to provide evidence to support the investigation of safety and security related incidents. Cameras are sited so that they are secure and protected from vandalism.

Old Cattle Market Skate Park Plaza

CCTV will be used to act as a deterrent to antisocial behaviour at the skate park (including vandalism and drug use). It will also be used to provide evidence to support the investigation of safety and security related incidents. CCTV will be used in conjunction with appropriate lighting. Cameras are sited so that they are secure and protected from vandalism.

Policy

1. CTC will not use CCTV for other purposes and will not include audio recording.
2. CCTV cameras will be sited so that recordings meet the stated purposes. They will cover entrances to the premises and cover play areas within the Town.
3. Cameras have been sited so that they provide clear images.
4. Cameras have been positioned to avoid capturing the images of persons not visiting the premises. The use of a surveillance camera must take into account its effect on individuals and their privacy, with annual reviews taking place to ensure its use remains justified.
5. Regular checks are carried out to ensure that the system is working properly and produces high quality images.
6. CTC will be transparent in our use of CCTV and we will make all who use the premises aware of its use, including the Town Clerk's details, for access to information and complaints, through appropriate signage.
7. CTC has procedures for operating and accessing CCTV recording equipment, which we will communicate to those users, contractors and third parties who administer, access or operate the equipment or data. The named individual responsible for the system is Esther Greig, Town Clerk.
8. CCTV recordings and data will be classified as confidential information and held in secure systems with appropriate security measures to safeguard against unauthorised access and use. This includes password protected computers where this information is stored, and hardware stored in a lockable room.
9. CTC will ensure that contractual arrangements with any contractors or third-party suppliers who may maintain or administer CCTV systems on our behalf cover confidentiality and information security.
10. Users will only access and view CCTV recordings and data in response to a request by law enforcement bodies, Councillors or data subjects, authorised by the Clerk (and in her absence, the Deputy Town Clerk) and/or Mayor. Details of how to request information are included in CTC's Freedom of Information Publication Scheme.
11. Information will be stored in a way that allows relevant frames to be isolated to answer a request. Training has been given to authorised staff (Town Clerk and Deputy Town Clerk) on the operation, playback and downloading of recorded images for law enforcement purposes. This can be done without interrupting the operation of the system or loss of data. GDPR training has also been given to staff.
12. CCTV information will not be disclosed except as necessary for the stated purpose, for law enforcement bodies, or to respond lawfully to a request under GDPR or Freedom of Information Act (FOI). Staff operating the system are aware of DPA Rules, in particular s10 DPA (prevent processing likely to cause substantial and unwarranted damage or distress) and (s12 DPA) prevent automated decision-making in relation to the individual.

13. Recordings and data will routinely be held for 4 weeks and then deleted.
14. This policy will be reviewed annually to ensure legal requirements and standards are complied with in practice.