

WOOLAVINGTON PARISH COUNCIL

CCTV Policy

Introduction

On 25 May 2018 the *General Data Protection Regulation (GDPR)* came into force across the EU and replaced all data protection legislation in EU member states (including the UK's Data Protection Act 1998).


This Policy explains how Woolavington Parish Council will operate the CCTV systems owned by it and located at Woolavington Village Hall and at the Sports field Pavilion and will comply with current legislation. It is prepared after taking due account of the *Code of Practice for Surveillance Cameras and Personal Information* published by the Information Commissioner.

The Policy should also be read in conjunction with the Parish Council's *Privacy Notice* and the council's *Privacy Impact Assessment on Surveillance Camera System (CCTV) at Woolavington Village Hall and Lower Playing Field and at the Playing field* available on the Parish Council website.

Statement of Purpose

The purpose(s) of the CCTV system installed by the Parish Council is:

- to monitor the security of the Village Hall and car park and the Parish Council play equipment and assets in the Lower Playing Field and the Playing field and car park off Sedgemoor Way;
- to assist Law Enforcement Agencies with identification, detection, apprehension and prosecution of offenders of crime and anti-social behaviour in the vicinity of the Village Hall, car park and Lower Playing Field and the Sports field by providing them with retrievable relative images provided by the system;
- to provide a safe and secure environment for users and visitors and staff and to help prevent loss or damage to the Playing field, Pavilion, Village Hall, motor vehicles in the car park and equipment and assets of the Parish Council;
- to reduce the fear of crime and anti-social behaviour of persons using and working in the Pavilion and Village Hall so they can enter and leave the buildings and use the facilities provided by both and the Parish Council without fear of intimidation by individuals or groups;
- to reduce the fear of sessions inside the hall and pavilion being disrupted by intruders giving rise to anti-social behaviour and foul language;
- to deter potential offenders by publicly displaying the existence of CCTV and signs of its operation in and around the Woolavington Village Hall and Playing field.

Approved:	
Date:	18 Nov 2025

Lawful basis for processing

The Parish Council is a public authority and has certain powers and obligations. Most personal information collected by it is processed for compliance with a legal obligation which includes the discharge of the council's statutory functions and powers.

A parish council may for the detection or prevention of crime in its area install and maintain any equipment, establish and maintain any scheme, or assist others to install and maintain any equipment or to establish and maintain any scheme.

The purpose of installing the council's CCTV system is as set out above and in the Council's *Privacy Impact Assessment on Surveillance Camera Systems (CCTV) at Woolavington Village Hall and Playing field* available on the Parish Council website. Any personal information collected and used in connection with the CCTV system will be processed to provide for the general public's benefit a safe and secure environment, free from crime and anti-social behaviour, and damage to buildings and assets provided for community use and enjoyment.

Camera Locations:**Village Hall (what3words:unfit.resources.allies)**

7 high-definition cameras are fixed to the Village Hall soffit and positioned to cover the perimeter of the building. A further long range high definition camera fixed at high level on the Village Hall focuses on the playing area. 3 further cameras are installed within the building. All the cameras have built-in infra-red ability for night-time usage.

A 16 channel recorder is situated within the library and is stored in a secure cabinet to which, only the named operatives will have access. There is a monitor adjacent to the cabinet which can only be viewed by the named operatives having logged onto the CCTV system.

<u>CAMERA 1</u>	
Purpose	General internal view of main foyer.
View	Observing towards the main entrance doors and taking in doors to the toilets and lounge
<u>CAMERAS 2&8</u>	
Purpose	General external view across the rear of the building.
View	Observing the rear fire door entrances and part of the lower car park.
<u>CAMERA 3</u>	
Purpose	General external view of side entrance road to the car park.

View	Observing towards Higher Road and taking in part of the play park.
<u>CAMERA 6</u>	
Purpose	General external view of the side entrance road to the car park.
View	Observing towards the car park and taking in the playing field.
<u>CAMERAS 4&7</u>	
Purpose	General interior view of the main hall.
View	Observing across the main hall at the stage and bar ends of the hall towards the fire doors.
<u>CAMERAS 9&10</u>	
Purpose	General exterior view of the front of the building.
View	Observing down to the front entrance doors and across the front to Higher Road.
<u>CAMERA 5</u>	
Purpose	General Long-range view of the play park.
View	Observing the whole length of the play park.

Pavilion (what3words:footpath.emeralds.shipwreck)

The table below give details of the seven cameras mounted on the pavilion in the Sports field.

<u>CAMERAS 1-4</u>	
Purpose	General view of the external areas.
View	Observing the generic external areas.
<u>CAMERA 5</u>	
Purpose	General view of the external play area.

View	Observing the playfield area.
<u>CAMERA 6</u>	
Purpose	General view of the skate park.
View	Observing the skate park area.
<u>CAMERA 7</u>	
Purpose	General view of the car park area
View	Observing the parking area.

A 16 channel recorder is situated within the store room and is stored in a secure cabinet to which, only the named operatives will have access. There is a monitor adjacent to the cabinet which can only be viewed by the named operatives having logged onto the CCTV system.

For both installations every effort has been made to ensure that the CCTV cameras are sited and image capture is restricted so as not to view or record areas that are not intended to be the subject of surveillance, such as individuals' private property.

The system at the Village Hall has sound recording capability. The Pavilion system does not have sound recording. Neither system has remote access enabled.

Maintenance

The both the village hall and pavilion CCTV systems are maintained for the Parish Council by Coomber Security.

Signage

In areas where the CCTV is installed the Parish Council will ensure that there are prominently placed signs at both the entrance to the CCTV zone and within the controlled area. The signs will be clearly visible and readable, of an appropriate size depending on the context and will signal that Woolavington Parish Council is operating the system, the purpose for it and who to contact about the scheme.

Management of the system

Woolavington Parish Council has responsibility for the control of images and decisions on how the CCTV systems are used.

Day-to-day operational responsibility for both the Village Hall and Pavilion rests with named individuals (the *Operators*) approved by the council. The list of operators and associated

details is contained in a separately maintained document (ref WPC-POL-20250002) and they may be consulted out of hours, if and when necessary.

The Operators are aware of the procedures that need to be followed when accessing recorded images and are trained in their responsibilities under the CCTV Code of Practice.

All Councillors are aware of the restrictions in relation to access to, and disclosure of, recorded images.

The Parish Council has notified the Information Commissioner's Office of both the name of the Parish Council, as data controller, and the purpose for which the images are used.

Image storage, viewing and retention

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

Access to both live and recorded images is restricted to the Operators, authorised members of Law Enforcement Agencies and individuals who have made an appropriated 'Individual Access Request'.

All access requests (disclosure) to live and recorded data shall be documented (See Appendix A for details of what is documented).

Documented access requests shall be audited quarterly to ensure that the forms have been completed correctly and that the justification for the viewing the data is appropriate.

Live & recorded images can only be viewed in a restricted area, as detailed in WPC-POL-20250002, which are approved by the Parish Council by the approval of this document.

Mobile apps shall not be used to view live data.

Periods of retention of images are intended to reflect the Parish Council's purpose for recording the information. All images shall be deleted at 30 day intervals which will provide adequate time for any incidents of a criminal or anti-social nature to have come to light and to have been reported to Law Enforcement Agencies (usually the police). The operators shall log confirmation that the previous 30 days of recorded data has been deleted.

On occasion, however, personal information may need to be retained longer where, for example, an incident has been identified and an access request has been made, or time is required to enable the police to collect relevant images, or the police are investigating a crime and ask for images to be preserved to afford them the opportunity to view the information as part of an active crime investigation. A record of this process will be captured.

Images retained for evidential purposes shall be kept in a secure area (physical or digital) accessible by the Operators only. The Clerk will ensure that the reason for retention is recorded, where the images are kept, any use made and when they are finally destroyed.

Disclosure of images

Judgements regarding disclosure to third parties (such as system maintenance providers) can only be authorised by the Parish Council, as data controller, with the right to refuse any request for information unless there is an overriding legal obligation, such as a court order or information access rights.

Disclosure of information will be controlled and consistent with the purpose(s) for which the system is established. It is intended that CCTV images produced on the system will be used by Law Enforcement Agencies alone for their purposes of detecting, investigating and preventing criminal or anti - social behaviour.

Once the disclosed information is transferred to the police or any other law enforcement body, they will become data controller for the copy they hold.

The transfer of disclosed data shall be via appropriately secure means such that only the person making the transfer request is able to view and take responsibility for the data.

All requests for disclosure are recorded and approved by the Parish Council (Clerk, Chair or Vice Chair). If disclosure is denied, the reason is documented.

Individuals' access requests

Individuals whose images are recorded have a right to be provided with a copy of the images caught by the request that constitute their personal data, unless they agree otherwise, such as by viewing the footage. Requests for access should be made by email or in writing to the Clerk.

If a request is received the Clerk will comply with it within one month of receiving the request. No fee will be charged unless the request is manifestly unfounded or excessive.

Those requesting access must provide enough detail to allow the Operators to identify that they are the subject of images, and for the Operators to locate the images on the system, for example: date, time and location.

All requests for access are recorded. If disclosure is denied, the reason is documented and the individual will be informed within at least one month of the reason and their right to complain to a statutory authority.

Other Individuals' Rights

Unless subject to an exemption, the law gives individuals additional rights to control what personal information the Parish Council uses and how.

Change of inaccurate information

If something written on a file that is out of date, incomplete or incorrect, the Parish Council will update it.

Right to erasure

An individual can ask for their personal information to be deleted where it is no longer necessary, was unlawfully processed, they withdraw their consent or object to the processing, or they need to comply with a legal obligation.

Right to restrict use of personal information

Where there is a dispute in relation to the accuracy or processing of personal information, or it is needed regarding a legal claim, the individual has the right to request a restriction is placed on further processing.

Right to object

Individuals have the right to object to the processing of their personal information.

Right to complain

Individuals have the right to lodge a complaint with the Information Commissioner

The Parish Council will consider any request made to the Clerk.

Enquires about the operation of the CCTV

Requests can be made to a public authority for information under the Freedom of Information Act 2000 relating to surveillance systems, such as the operation of the system, its siting or the cost of using and maintaining it. If such a request is received by the Parish Council it will consider whether disclosure is appropriate and/or whether an exemption under the Act applies.

Requests under the Freedom of Information Act must be in writing and will receive a written response within 20 working days from the Clerk.

Monitoring, compliance, evaluation and review

The Parish Council is committed to the recommendations of the *Code of Practice for Surveillance Cameras and Personal Information* published by the Information Commissioner.

To exercise any rights, queries or complaints, please in the first instance contact the Clerk to the Parish Council at clerk@woolavington-pc.gov.uk.

For independent advice, data protection compliance concerns or to lodge a formal complaint, contact the Information Commissioner's Office on 0303 123 1113 or at <https://ico.org.uk/global/contact-us/email> or Wycliffe House, Water Lane, Wilmslow, Cheshire SK9 5AF.

The Parish Council will undertake regular audits to ensure the use of the CCTV continues to be relevant and appropriate in accordance with its stated purpose, location, images recorded, storage length and deletion.

The efficacy of this policy will be reviewed at least annually by the Parish Council and any updates will be placed on this web page and the approval date on the first page will indicate when this policy was last updated. Any changes are effective when we post the updated policy.

Any major change that would have a significant impact on either the purpose(s) or this policy will take place after discussion by the Parish Council and resolution at a Council meeting. All agendas are posted on the Parish Council notice board and website at least 3 clear days excluding weekends before Council meetings.

If the Parish Council decides to change the way in which it uses the CCTV, it will provide members of the public with information of the new purpose(s) prior to commencing the processing and setting out the relevant purposes and processing conditions and will inform the Information Commissioner within 28 days.

Appendix A

Below details the data collected for a data access request be this by the operators, Law enforcement or an individual access request.

Data Request reference (format WPC-DAT-(<i>year+sequential number</i>)):
Date of Data Access Request:
Full Name of the Data Access Requestor:
Full Address of the Data Access Requestor or name of Organisation:
Data Access Request made by (<i>Operator/Law Enforcement Agency/Individual</i>):
Brief Description of the Data Access Request (<i>including date(s) and time period(s)</i>):
Is the Data Access Request Approved (<i>Yes/No</i>):
Data Access Request Approver (<i>Full Name, Signature (digital signature acceptable) and date</i>):
Reason for NOT approving Data Access Request:
Date Data Access Requestor Informed:
Is there a request to transfer data to a third party (<i>Yes/No</i>):
Third Party data transfer details (<i>Full name, organisation</i>):
Details of how data transferred (<i>media and date</i>):
Confirmation of data transfer to Third Party:
Is there a request to retain data past the normal retention period (<i>Yes/No</i>):
Detail where the retained data is stored and for how long:
Confirm retained data deleted after the requested retention period (<i>signature (digital signature acceptable) and date</i>):
Description of the outcome of the Data Access Request:

A spreadsheet will be used to capture and store the data under the file name WPC-FIL-20250001.