



# **CCTV POLICY**

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# CCTV Policy

## 1. Introduction

Saxilby with Ingleby Parish Council uses closed circuit television (CCTV) to provide a safe and secure environment for employees, councillors, contractors, volunteers and members of the public, and to protect council buildings, assets and public spaces.

This policy explains how the council uses CCTV in compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Information Commissioner's Office (ICO) CCTV Code of Practice.

The council's CCTV system records images only. No audio recording takes place.

## 2. Lawful basis for processing

The lawful basis for processing personal data through the use of CCTV is Article 6(1)(e) of the UK GDPR: the processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the council.

## 3. Purposes of CCTV

The council installs and uses CCTV for the following purposes to:

- Assist in the prevention and detection of crime and anti-social behaviour
- Assist in the identification and prosecution of offenders
- Promote the safety of employees, councillors, contractors, and members of the public
- Monitor the security of council premises and assets
- Support lone working arrangements and enable safe monitoring of entrance points
- Provide evidence in the event of incidents, complaints, claims, or investigations

CCTV will not be used for routine monitoring of staff. Any use of CCTV images in relation to staff conduct will be limited to specific incidents where there is a reasonable suspicion of unsatisfactory conduct, misconduct, unsafe working practices, or criminal activity, and will be proportionate and justified.

## 4. Location of cameras

Cameras are positioned at strategic points on council premises and in public or communal areas where there is a clear justification for surveillance. Cameras will not be installed in private areas such as toilets, changing facilities or shower rooms.

All cameras are clearly visible and appropriate signage is prominently displayed to inform individuals that CCTV is in operation.

## 5. Recording and retention of images

CCTV images are of sufficient quality for the purposes for which the system is used. The system is maintained and checked regularly to ensure it is operating correctly.

CCTV may record continuously or at specified times depending on operational need.

Recorded images are retained for a maximum of **three months**, after which they are automatically overwritten. Images may be retained for longer where required for the investigation of an incident, legal proceedings, or a request from a law enforcement agency.

Once no longer required, such images will be securely deleted.

Where storage media reaches the end of its useful life, it will be securely erased or destroyed prior to disposal.

## **6. Accessing and viewing CCTV images**

Access to live or recorded CCTV images is controlled.

- CCTV images may only be accessed where there is a legitimate and lawful reason consistent with the purposes of the system.
- Access must be necessary and proportionate. CCTV must not be viewed out of curiosity or for general monitoring.
- Only authorised persons may view live or recorded images.
- Wherever possible, access to recorded images must be authorised in advance by the Clerk, or by the Assistant Clerk in the Clerk's absence.
- Viewing will take place in a secure environment where unauthorised persons cannot see the images.
- Images must not be copied, photographed, or shared without proper authorisation.
- All access to CCTV footage will be recorded in a CCTV Access Log.

## **7. Working arrangements and entrance monitoring**

Where employees, clerks, or volunteers are working alone or under working arrangements where they may have limited immediate support, CCTV may be used to monitor entrance points and communal areas for personal safety and security purposes.

Authorised persons may view live CCTV images only to:

- Assess potential risks
- Monitor activity in communal areas where there is a safety or security concern
- Support personal safety and the security of council premises

Viewing must be limited to cameras covering entrance points and communal areas and must not be used for general or continuous monitoring.

Access to recorded footage remains restricted to authorised persons and must follow the council's standard CCTV access and authorisation procedures.

The use of CCTV to support working arrangements will be reviewed periodically to ensure it remains necessary and proportionate.

## **8. Disclosure of images**

Disclosure of CCTV images will only take place where it is lawful, necessary and proportionate, and in accordance with the purposes for which the system is operated.

Images may be disclosed to:

- Police and other law enforcement agencies
- Prosecution agencies such as the Crown Prosecution Service
- Legal representatives
- Individuals whose images have been recorded, subject to data protection exemptions
- Contractors or maintenance technicians, where access is necessary and supervised

Only the Clerk (or Assistant Clerk in their absence) may authorise disclosure of CCTV images

to third parties.

All disclosures will be documented, including the date, recipient and reason for disclosure.

### **9. Individuals' rights**

- Individuals have the right to request access to personal data held about them, including CCTV images, under the UK GDPR.
- Requests must be made in writing to the Parish Office and include sufficient information to locate the images, such as date, time and location. The council will verify the identity of the requester before processing the request.
- Where images contain third parties, reasonable steps will be taken to protect their privacy, including redaction where appropriate.

### **10. Training and awareness**

All staff involved in the operation, management or viewing of CCTV images will receive appropriate training on this policy and on data protection responsibilities.

### **11. Responsibilities and review**

The Clerk is responsible for the operation of the CCTV system and compliance with this policy.

A Data Protection Impact Assessment (DPIA) has been completed for the CCTV system (Appendix I) and will be reviewed periodically, particularly where changes are made to the system, its purpose or coverage.

This policy will be reviewed every two years or sooner if required.

## Appendix I: Data Protection Impact Assessment

# Data Protection Impact Assessment (DPIA)

**Project:** CCTV Systems

**Council:** Saxilby with Ingleby Parish Council

**Responsible Officer:** Clerk

*Review as part of the CCTV policy review cycle.*

## 1. Description of the processing

The Parish Council operates closed circuit television (CCTV) systems which records images only (no audio) in and around council premises and communal areas.

The system is used to monitor entrances and communal areas where there is a safety or security need. CCTV footage may be viewed live in limited circumstances or accessed retrospectively where an incident has occurred.

## 2. Purpose of the processing

The purposes of the CCTV system are:

- To promote the safety of employees, councillors, contractors and members of the public
- To support safe working arrangements, including where individuals may have limited immediate support
- To prevent and detect crime and anti-social behaviour
- To protect council premises and assets
- To provide evidence in the event of incidents, complaints, claims or investigations

## 3. Lawful basis

The lawful basis for processing personal data through the use of CCTV is:

- **Article 6(1)(e) UK GDPR** – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the council.

## 4. Nature of the data

The data processed consists of visual images of individuals who may enter or pass through areas covered by CCTV. This may include employees, councillors, contractors and members of the public.

No special category data is intentionally collected. No audio recording takes place.

## 5. Necessity and proportionality

The use of CCTV is considered necessary to address identified risks to safety and security.

- Cameras are limited to entrance points and communal areas
- Cameras are clearly visible and supported by appropriate signage
- CCTV coverage avoids private areas such as toilets or changing facilities
- Access to footage is strictly controlled and limited to authorised persons
- Retention of footage is limited to a maximum of three months unless required for investigation

The council considers the level of monitoring proportionate to the risks identified.

## 6. Risks to individuals

Potential risks include:

- Loss of privacy or perception of excessive monitoring
- Unauthorised access to CCTV images
- Misuse or inappropriate disclosure of footage

### 6a. Risk assessment matrix

The council has assessed the risks associated with the use of CCTV using a likelihood and impact matrix.

Risk	Likelihood (Low/Medium/High)	Impact (Low/Medium/High)	Risk Rating	Mitigation Measures	Residual Risk
Loss of privacy	Low	Medium	Low	Limited camera coverage, signage, policy controls	Low
Unauthorised access to footage	Low	High	Medium	Restricted access, secure storage, access log	Low
Misuse of CCTV images	Low	Medium	Low	Training, authorisation requirements, audit trail	Low
Excessive monitoring	Low	Medium	Low	Purpose limitation, not for routine staff monitoring	Low

## **7. Measures to mitigate risks**

The following measures are in place to reduce risks:

- A clear and approved CCTV Policy
- Restricted access to live and recorded footage
- Use of a CCTV Access Log for all access and disclosure
- Authorisation of disclosures by the Clerk or Chair
- Secure storage of footage
- Limited retention periods
- Staff and councillor training on data protection and CCTV use

## **8. Consultation**

This DPIA has been completed by the council. Where appropriate, advice may be sought from the council's data protection advisor or the Information Commissioner's Office.

## **9. Outcome and approval**

The council considers that the risks associated with the CCTV system are low and are appropriately mitigated by the measures in place.

The CCTV system may continue to operate in accordance with the CCTV Policy.

# Appendix I: ICO Checklist for limited CCTV systems<sup>1</sup>.

Review as part of the CCTV policy review cycle.

This CCTV system and the images produced by it are controlled by:

Saxilby with Ingleby Parish Council

who is responsible for how the system is used under the UK GDPR and Data Protection Act 2018.

We (Saxilby with Ingleby Parish Council) have considered the need for using CCTV and have decided it is necessary for the prevention and detection of crime and for protecting the safety of individuals, or the security of premises. We will not use the system for any incompatible purposes and we conduct regular reviews of our use of CCTV to ensure that it is still necessary and proportionate.

<p>If our system is processing footage of identifiable individuals and is processing personal data, we have registered as a controller and <a href="#">submitted a relevant data protection fee</a> to the Information Commissioner's Office (ICO). We have also recorded the next renewal date.</p>	<p>Yes Reg no.: Z1228871</p>
<p>There is a named individual who is responsible for the operation of the system.</p>	<p>Yes Clerk</p>
<p>Prior to processing we have clearly defined the problem we are trying to address. We regularly review our decision to use a surveillance system.</p>	<p>Yes Section 3 of CCTV policy</p>
<p>We have identified and documented an appropriate <a href="#">lawful basis</a> for using the system, taking into consideration Article(s) 6, 9 and 10 of the UK GDPR and relevant Schedules of the DPA 2018.</p>	<p>Yes Section 2 of CCTV policy</p>
<p>Our system produces clear images which we can easily disclose to authorised third parties. For example when law enforcement bodies (usually the police) require access to investigate a crime.</p>	<p>Yes</p>
<p>We have positioned cameras in a way to avoid any unintentional capture of private land or individuals not visiting the premises.</p>	<p>Yes</p>
<p>There are visible signs showing that CCTV is in operation. Contact details are displayed on the sign(s) if it is not obvious who is responsible for the system.</p>	<p>Yes</p>
<p>We securely store images from this system for a defined period and only a limited number of authorised individuals may have access to them.</p>	<p>Yes</p>
<p>Our organisation knows how to respond to individuals making requests for copies of their own images, or for images to be erased or restricted. If unsure the controller knows to seek advice and <a href="#">guidance</a> from the Information Commissioner's Office (ICO) as soon as a request is made.</p>	<p>Yes</p>

<sup>1</sup> <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/guidance-on-video-surveillance-including-cctv/checklist-for-limited-cctv-systems/>