



Peacehaven Town Council

Community House CCTV Policy

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Appendix 1: Map of Community House CCTV Cameras

1. Introduction & Policy Statement

Peacehaven Town Council believes that CCTV has a legitimate role to play in helping to maintain a safe and secure environment for all our staff and visitors, however, we recognise that this may raise concerns about the effect on individuals and their privacy. This policy is intended to address such concerns.

Images recorded by surveillance systems are personal data which must be processed under data protection legislation. We are committed to complying with our legal obligations and ensuring that the legal rights of individuals relating to their personal data are recognised and respected.

This policy is intended to assist Peacehaven Town Council in complying with their legal obligations when working with personal data. In certain circumstances, this misuse of information gathered by CCTV could constitute a criminal offence.

We currently use CCTV cameras to view and record individuals on and around our premises. This policy outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice. This policy also explains how to make a subject access request in respect of personal data created by CCTV.

We recognise that information that we hold about individuals is subject to data protection legislation. The images of individuals recorded by CCTV cameras are personal data and therefore subject to the legislation. We are committed to complying with our legal obligations and seek to comply with best practice suggestions from the Information Commissioner's Office (ICO).

This policy covers all employees and other individuals working and/or visiting our premises.

2. Definitions

CCTV – Closed Circuit cameras designed to capture and record images of individuals and property.

Data - information which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screenshots.

Data subjects - all living individuals about whom we hold personal information as a result of the operation of our CCTV.

Personal data - data relating to a living individual who can be identified from that data (or other data in our possession). This will include video images of identifiable individuals.

Data controllers – Peacehaven Town Council is the data controller of all personal data used

Data users - employees whose work involves processing personal data. Data users must protect the data they handle per this policy.

Data processors - any person or organisation that is not a data user (or employee of Peacehaven Town Council) that processes data on our behalf and following our instructions (for example, a supplier which handles data on our behalf).

Processing - any activity which involves the use of data. It includes obtaining, recording or holding data, or carrying out any operation on the data including organising, amending, retrieving, using, disclosing or destroying it. Processing also includes transferring personal data to third parties.

Our Premises – Community House, Greenwich Way, Peacehaven, BN10 8BB.

3. Personnel Responsibilities

Peacehaven Town Council has overall responsibility for ensuring compliance with relevant legislation and the effective operation of this policy. Day-to-day management responsibility for deciding what information is recorded, how it will be used and to whom it may be disclosed has been delegated to the Town Clerk. Day-to-day operational responsibility for CCTV cameras and the storage of data recorded is the responsibility of the Town Clerk.

Responsibility for keeping this policy up to date has been delegated to the Town Clerk

4. Purpose of the CCTV

We currently use CCTV around our site as outlined below. We believe that such use is necessary for legitimate purposes, including:

- a. to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- b. For the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- c. to support law enforcement bodies in the prevention, detection and prosecution of crime;
- d. to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings;
- e. to assist in the defence of any civil litigation;
- f. To comply with the licencing requirements of the premises.

This list is not exhaustive and other purposes may be or become relevant.

5. How we will operate the CCTV

CCTV monitors the building 24 hours a day and this data is recorded.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

Surveillance systems will not be used to record sound.

We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place).

Images are monitored by authorised personnel during working hours only.

Staff using CCTV will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data

Where CCTV cameras are placed, we will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. Such signs will contain details of the organisation operating the system, the purpose of using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.

Live feeds from CCTV cameras will only be monitored where this is reasonably necessary, for example, to protect health and safety.

We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include staff involved with disciplinary or grievance matters.

Recorded images will only be viewed in designated, secure offices. Where practical a minimum of two people should view the CCTV at any one time and only for specific reasons.

6. Use of data gathered by CCTV

To ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

We may engage data processors to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

7. Retention and erasure of data gathered by CCTV

Data recorded by the CCTV system will be stored digitally on the hard drive of the CCTV. CCTV images are not to be retained for longer than necessary, as defined by the requirements set in the premises licence. Data storage is automatically managed by the CCTV digital recorder which uses software programmed to overwrite historical data in chronological order to enable the recycling of storage capabilities. This process takes approximately 31 days.

On occasion it may be necessary to retain downloaded images or footage for a longer period, for example when a law enforcement body is investigating a crime, to allow them to view the images as part of an active investigation.

At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.

8. Review of CCTV use

We will ensure that the ongoing use of existing CCTV cameras in the premises is reviewed periodically to ensure that their use remains necessary and appropriate and that any surveillance system is continuing to address the needs that justified its introduction.

9. Requests for disclosure

We may share data with others where we consider that this is reasonably necessary for any of the legitimate purposes set out above in section 4. Requests must be made in writing to the Town Clerk.

No images from our CCTV cameras will be disclosed to any third party, without express permission being given by the Town Clerk. Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order that has been produced.

In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

We will maintain a record of all disclosures of CCTV footage subject to document retention guidelines.

No images from CCTV will ever be posted online or disclosed to the media.

10. Subject Access Requests

Data subjects may request disclosure of their personal information and this may include CCTV images (data subject access request). A data subject access request should be made in writing. A response should be provided within a month. We should tell the individual why we are processing the information, the types of data involved, who we have shared it with, how long we will keep it and advise them as to their rights including the right to complain to the ICO if concerned about our processing.

For us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

We will provide a copy of the individual's personal data to them but reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so. We will consider the ICO Code of Practice and the law when deciding as to whether to disclose third party personal data.

11. Complaints

If anyone has questions about this policy or any concerns about our use of CCTV, then they should speak to the Town Clerk in the first instance.

12. Requests to prevent processing

We recognise that, in rare circumstances, individuals may have a legal right to object to processing and in certain circumstances, to prevent automated decision making (see Articles 21 and 22 of the GDPR). For further information regarding this, please contact the Town Clerk.

Adopted by Committee: 9th July 2024

Review by: 9th July 2029

APPENDIX 1. Map of Community House CCTV Cameras

