BARLASTON PARISH COUNCIL

CCTV Policy
GDPR3

CCTV POLICY

Revision History

This document was originally written by:

Name	**Position**	**Date**
Data Protection Enterprise Ltd		03 February 2023

This document was reviewed by:

The Parish Council	10 March 2026

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The Parish Council at their meeting on	10 March 2026

Document Review schedule:

Next Mandatory Review by	March 2027

Version Control

Version	**Issue Date**	**Document ID**	**Reason for Change**	**Section changed**
1	3 Feb 2023	GDPR3	New Policy - Data Protection Enterprise Ltd www.dataprotectionenterprise.co.uk	New Policy
2	10 March 2026	GDPR3	Annual review; updated references to current Data Protection policies; clarified ICO guidance, covert monitoring, SAR procedures, and technical storage; minor formatting and typo corrections. Updated by The Clerk.	Multiple changes during the review

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Policy amendments may occur at any time and you should consult the Policies page on the website for the latest update.

1. PURPOSE

The Purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Barlaston Parish Council, hereafter referred to as 'the Parish Council'.

CCTV systems are installed (both internally and externally) in premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the Parish Council is intended for the purposes of:

- protecting Parish Council buildings and assets, both during and after working hours;
- promoting the health and safety of staff and visitors
- preventing bullying and/or intimidation by individuals and/or groups;
- reducing the incidence of crime and anti-social behavior (including theft and vandalism);
- supporting the police in a bid to deter and detect crime;
- assisting in identifying, apprehending and prosecuting offenders; and
- ensuring that the Parish Council rules are respected so that the Parish Council can be properly managed.

The system does not record sound.

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

Any new or relocated cameras will involve consultation with members of the Parish Council.

The Parish Council's CCTV is registered with the Information Commissioner under the requirements of the Data Protection Act 2018 and the UK General Data Protection Regulation (GDPR).

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are made aware of their responsibilities in following the Home Office CCTV guidance. All employees are aware of the restrictions in relation to access to, and disclosure of recorded images.

2. SCOPE

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The Parish Council complies with the Information Commissioner's Office (ICO) CCTV guidance to ensure it is used responsibly and safeguards both trust and confidence in its use.

CCTV warning signs will be clearly and prominently placed at main external entrances. Signs will contain details of the purpose for using CCTV (see Appendix A). In areas where CCTV is used, the Parish Council will ensure that there are prominent signs placed within the controlled area.

The planning and design have endeavored to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect every single incident taking place in the areas of coverage.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the Parish Council, including Equality & Diversity Policy,

Codes of Practice for dealing with complaints of Bullying & Harassment and Sexual Harassment and other relevant policies, including the provisions set down in equality and other related legislation.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas for security purposes within Parish Council premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Parish Council. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018

3. LOCATION OF CAMERAS

The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (as described above), and care will be taken to ensure that reasonable privacy expectations are not violated. The Parish Council will ensure that the location of equipment is carefully considered to ensure that the images captured comply with the legislation.

The Parish Council will make every effort to position the cameras so that their coverage is restricted to Parish Council premises, which includes both indoor and outdoor areas.

Parish Council members and staff will have access to details of where CCTV cameras are situated, with the exception of cameras place for the purpose of covert monitoring.

CCTV Video Monitoring and Recording of Public Areas may include the following:

- ***Protection of buildings and property:*** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, cashier locations, receiving areas for goods/services
- ***Monitoring of Access Control Systems:*** Monitor and record restricted access areas at entrances to buildings and other areas
- ***Verification of Security Alarms:*** Intrusion alarms, exit door controls, external alarms
- ***Video Patrol of Public Areas:*** Parking areas, Main entrance/exit gates, Traffic Control
- ***Criminal Investigations (carried out by the police):*** Robbery, burglary and theft surveillance

4. COVERT MONITORING

The Parish Council retains the right in exceptional circumstances to set up covert monitoring. For example:

- Where there is good cause to suspect that an illegal or serious unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
- Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.

In these circumstances, authorisation must be obtained beforehand from the Data Protection Officer, Chair and/or Deputy Chair.

Covert Monitoring will cease following completion of an investigation.

Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example, toilets.

5. STORAGE AND RETENTION OF CCTV IMAGES

Recorded data will not be retained for longer than 31 days except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

Where data is retained for longer than 31 days an electronic file held on a secure central server where specific CCTV image/recordings are retained will be kept. The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the Parish Council's purposes for recording information, and how long it is needed to achieve this purpose.

The Parish Council will store data securely at all times.

6. ACCESS TO CCTV IMAGES

Access to recorded images will be restricted to authorised personnel to view them and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the Parish Council. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

7. SUBJECT ACCESS REQUESTS (SAR)

7.1 Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.

7.2 All requests should be made to the Clerk of Barlaston Parish Council who can be contacted by email at clerk@barlastonparishcouncil.gov.uk or telephone 01782 373348 (Mon– Wed). Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location.

7.3 The Parish Council does not have a facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if available.

7.4 The Parish Council will respond to requests within one calendar month of receiving the request.

7.5 The Parish Council reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8. ACCESS AND DISCLOSURE OF IMAGES TO THIRD PARTIES

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

8.2 If an order is granted by a Court for disclosure of CCTV images, then this should be complied with. However, very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure, then the Parish Council should seek expert advice from a Data Protection Officer in the first instance and appropriate legal advice may be required.

8.3 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.

9. RESPONSIBILITIES

The Parish Council retains overall responsibility and will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the Parish Council premises.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.
- Ensure that the CCTV monitoring is consistent with the highest standards and protections.
- Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.
- Maintain a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system.
- Ensure that monitoring recorded tapes are not duplicated for release.
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally.
- Give consideration to both Parish Council members and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment.
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the Parish Council and be mindful that no such infringement is likely to take place.
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring tapes are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 31 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by Parish Council members.
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics.
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

10. DATA PROTECTION IMPACT ASSESSMENTS AND PRIVACY BY DESIGN

CCTV has the potential to be privacy intrusive. The Parish Council will perform a privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary and proportionate and address a pressing need identified.

11. POLICY REVIEW

The Clerk of Barlaston Parish Council is responsible for monitoring and reviewing this policy.
In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

12. LINKS WITH OTHER POLICIES

This CCTV policy links with the Parish Council's:

- Data Protection Policy
- Data Security Policy
- Data Breach Policy
- Privacy Notice
- Rights Request Policy
- Data Handling Policy
- Data Map / Information Audit
- Accessibility Statement

APPENDIX A **CCTV SIGNAGE**

It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The Parish Council is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded.
- The purposes of using CCTV.
- The name of the Parish Council.
- The contact telephone number or address for enquiries.

Example Sign



WARNING

CCTV cameras in operation

Images are being monitored and recorded for the purpose of crime-prevention, the prevention of anti-social behaviour, the prevention of bullying, for the safety of our members, staff, members of the public and for the protection of the Parish Council and its property. This system will be in operation 24 hours a day, every day. These images may be passed to the police.

This scheme is controlled by Barlaston Parish Council

For more information contact Barlaston Parish Council on 01782 373348 (Mon-Wed)

Chairman Date: 10 March 2026