



Meriden Parish Council

CCTV Policy

For Meriden Sport Park

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CCTV POLICY

Purpose and introduction

Meriden Sports Park has a Closed-Circuit Television (CCTV) platform and associated recording equipment installed on site. This system utilises existing infrastructure including the data network and camera equipment and has updated technology including HD digital cameras to maximise its efficiency and enhance the quality.

Meriden Sports Park has a variety of visitors and customers on a daily basis and to meet the challenge of monitoring activity, has established a number of CCTV cameras throughout its estate. These cameras are located in the car park, around the park and in the Pavilion Building.

CCTV has been common place throughout communities for some time and is a vital tool in the detection and prevention of crime. This document attempts to set out guidelines and procedures to ensure that the use of CCTV at the Sports Park is in line with the legal requirements and code of practice and seeks to ensure that the CCTV on site is used responsibly.

This policy will adopt the 12 Principles of the Surveillance Camera Commissioner and the 7 Principles of the GDPR.

Scope

This policy covers all individuals working at all levels and grades, including executives, employees, consultants, contractors, trainees, part-time and fixed-term employees, casual and agency staff (collectively referred to as **staff** in this policy), volunteers and Parish Councillors.

Third parties who have access to our electronic communication systems and equipment are also required to comply and be aware of this policy.

Some staff members and Councillors will have more contact and responsibility towards CCTV than others, but awareness and knowledge of the CCTV procedures are important for all to understand.

Policy

Meriden Sports Park is committed to ensuring that its staff and Councillors have the appropriate knowledge to perform their roles. This policy will set out the rules surrounding safely sharing personal information and what procedures are in place to achieve this with regards to the CCTV system run at Meriden Sports Park.

Monitoring and Review Process

This policy will be monitored and reviewed on an annual basis by Meriden Parish Council. Any changes will be amended, and the policy re-published with appropriate communications corporately to ensure any changes are received and understood by the company.

Disciplinary Process

A breach of this policy, puts the parish council at risk. It could result in a breach of current legislation and possibly a monetary penalty notice. It also puts the council's reputation at risk and could have a commercial effect on Meriden Sports Park's business. Any breach of CCTV Policy could lead to disciplinary action being taken under the Parish Council Code of Conduct Policy, Directors Code of Conduct or against the Hirer against those who commit such a breach.

ORGANISATIONAL RESPONSIBILITIES

As noted in the introduction of this policy, all staff are subject to the terms of this policy. It is the responsibility of all members of staff, from the Parish Council downwards, that where they do not understand requirements, or need further guidance and advice, that this is sought immediately from the (Parish Council Clerk or Named Councillor) the owners of the document. These duties are as follows:

Parish Council:

The Parish Council is accountable and responsible for:

- Agreeing the publication and implementation of this policy.
- Promoting the policy.
- Approving the policy review bi-annually.
- Ensuring that the terms of this policy are passed down to relevant suppliers and third parties.
- Ensuring adequate resources are allocated towards the fulfilment of this policy's requirements.
- Implementing control practices supporting this policy along with a regular audit to ensure the effectiveness of the controls and continuing improvement of the practices.
- Ensuring the Parish Clerk and Named Parish Councillor is involved, properly and in a timely manner, in all issues which relate to the protection of personal data.

Parish Clerk/Named Parish Cllr

The Parish Clerk/Named Parish Cllr is responsible for the data protection compliance with regards to CCTV and wider GDPR monitoring and advice. Specifically, the Parish Clerk/Named Parish Cllr will;

- Provide advice and support to all areas of the business with regards to CCTV compliance.
- Ensure that the CCTV system is administered in line with the rights of the data subject.
- Ensure that CCTV monitoring staff are trained in the Rights of the Data Subject and able to respond appropriate, in line with the Data Subjects Rights Policy, any requests received.

PARISH CLERK/NAMED PARISH CLLR is responsible for

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T: 01676 522474 **M:** 07767 162423 **E:** barbarablandmpc@btconnect.com
E: clerk@meridenparishcouncil.org.uk
www.meridenparishcouncil.org.uk

- Bi-Annually updating the policy document.
- Publishing and distributing the policy.
- Liaising with experts and professional services to ensure that it remains current and relevant.

The CCTV Asset (System) Owner

The CCTV System Owner is responsible for allocating appropriate access to the CCTV system. Record will be kept of users' justification for accessing the system and the cameras to which they have access.

They will be the main contact point for access requests to view footage and will be responsible for maintaining records of all processing activities.

Additionally, they are required to periodically review audit files to ensure that designated users are not abusing the right to access the CCTV system.

Staff

Staff must adhere to the terms of this policy and the guidance offered in operational procedures pertaining to Data Protection. All staff are expected to comply with this policy always to protect Personal data from unauthorised access and harm.

Third Parties

Third parties must adhere to the terms of this policy and as well as any data handling practices as dictated by contractual agreements with the Parish Council. Breach of this policy may be dealt with under our contractual terms and, in serious cases, may be treated as sufficient grounds to terminate a contract.

THE RELEVANT PRINCIPLES.



The Data Protection Principles

This policy requires strict adherence to the following principles of data protection which are intended to protect the rights and freedoms of Data Subjects. Violation of any of these principles represents a violation of GDPR.

Principles

1. Processed lawfully, fairly and in a transparent manner in relation to the data subject.
(Lawfulness, fairness and transparency).
2. Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatibly with those purposes.
(Purpose limitation).
3. Adequate, relevant and limited to what is necessary in relation to the purposes for which they processed.
(data minimisation)
4. Accurate and, where necessary, kept up to date.
(accuracy)
5. Kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
(storage limitation)
6. Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures
(integrity and confidentiality)
7. The controller shall be responsible for and be able to demonstrate compliance with the above first 6 principles.
(accountability)

Advice and guidance for all members of staff to enable them to apply the Principles as listed above can and should be sought from the Parish Clerk/Named Parish Councillor.

The Surveillance Camera Commissioners Principles

The Secretary of State has issued a Surveillance Camera Code of Practice under Section 30 of the Protection of Freedoms Act 2012, which provides guidance on the use of CCTV, Body Worn Video and Drones with cameras. It explains how the government is supportive of the use of overt CCTV provided that certain conditions are met and to ensure these are met has put together the following twelve guiding principles.

There are more details for each of the 12 principles in the Code of Practice, which needs to be read in conjunction with this policy. The 12 principles, which have been adopted, in full, by the parish council, are;

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must consider its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be securely deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such



access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.

8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.

9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.

11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.

12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

Where any member of staff needs advice or guidance on either the Data Protection Principles or the Surveillance Camera Commissioners Principles they should contact the Parish Clerk/Parish Council.

CCTV Codes of Practice

Both the Information Commissioners Office and the Surveillance Camera Commissioners Codes of Practice have been adopted by Meriden Parish Council.

Regulation of Investigatory Powers (RIPA)

Targeted covert (secret) surveillance of individuals will only be undertaken for good reason, and in line with the procedures set out in the Regulation of Investigatory Powers Act (RIPA) Policy. Organisations can only authorise use of directed surveillance under RIPA to prevent or detect criminal offences that are punishable, whether on summary conviction or indictment, by a maximum term of at least 6 months' imprisonment.

RIPA only applies directly to the public sector, however should any local police forces wish to use Meriden Sports Park's CCTV in a covert manner, then Meriden Sports Park is to request to see a copy of the Forces signed RIPA form, or at least a relevant page of it, depending on the sensitivity of the operation. Allowing any external organisation to covertly use our systems will require documentation to confirm it is being carried out lawfully. If there are any concerns or queries, contact the Parish Council Clerk for advice

Moving or zooming CCTV towards individuals and their activities would be considered covert surveillance unless criminal activity or public safety issues are already taking place, and cameras are moved or zoomed in response to this.

THE CCTV SYSTEM

The CCTV system is used for the following key objectives which will be subject to an annual assessment:

- To detect, prevent or reduce the incidence of crime.
- To prevent and respond effectively to all forms of possible harassment and disorder.
- To reduce the fear of crime.
- To create a safer environment.
- To provide emergency services assistance.
- To assist with health and safety and other serious occurrences, including employment issues.
- For security purposes, predominantly compliance and performance monitoring and measuring.

How images and Information are stored.

Images and information will be stored in line with industry standards, relevant to the type of CCTV system installed.

Recorded images and CCTV information will only be used for the purposes defined in this Policy and in both the ICO and SCC Codes of Practice and ownership of the recorded material is with the

company as the Data Controller. Recording equipment will be checked to a regular schedule, as defined in each Code of Practice.

CCTV images will only be viewed when there is a legitimate business reason to do so and the showing of recorded material to other internal or external individuals will only be allowed in accordance with the law. The viewing of CCTV images is classed as "Processing" under the GDPR and therefore records will be kept of all processing of CCTV.

Recorded images will be stored securely in digital format. Where there is a business reason to keep an image longer than the usual set retention period, the image will be copied and stored securely, again in digital format, with new, relevant set retentions documented. Where relevant the other Parish Council policies will also govern how certain aspects of the CCTV systems are used.

Requests for footage

Removal of recorded footage will be tightly controlled by Meriden Parish Council and data extraction from the system will only be carried out by authorised persons. Requests, as and when received, will be subject to scrutiny and legal compliance.

Requests will be regarding the prevention and detection of crime or terrorism, and will be dealt with on a case by case basis through an exemption available in the GDPR for crime.

Individuals who are captured on CCTV are entitled to request a copy of that footage.

This process is called Right of Access under the GDPR and is common known as a Subject Access Request. There will be information both on CCTV signage and the company website which details how individuals can make a request to see CCTV footage of themselves.

There is also the opportunity for requests from organisations such as Insurance Companies or Solicitors firms to request footage for legal purposes, and in these cases requests will again be determined on a case by case basis, and where legal and appropriate, footage may be released.

Internal Requests for Information

Sometimes internal departments/ Contractors/hirers may need to request access to CCTV images about internal investigations. Any requests of this type need to be made in writing to the Parish Council. This is to ensure that all uses of CCTV are done so lawfully.

The use of CCTV

Meriden Parish Council acknowledges that the use of CCTV is intrusive and puts people under surveillance who are simply going about their day to day activities; however, it is a vital tool in the prevention and detection of crime and for ensuring the health and safety of the occupants on its estate.

Prior to the installation of new equipment, it is important to identify the specific purpose of the camera and this should be in line with recommendations of the Home Office Scientific Development using four categories:

- **Monitoring:** to watch the flow of traffic or the movement of people where you do not need to pick out individual figures.
- **Detecting:** to detect the presence of a person in the image, without needing to see their face.
- **Recognising:** to recognise somebody you know, or determine that somebody is not known to you.
- **Identifying:** to record high quality facial images that can be used in court to prove someone's identity beyond reasonable doubt.

The use of CCTV is restricted and the system is password protected to prevent unauthorised access. CCTV workstation is operated from the Control Room on site and will not be used in the public environment to prevent unauthorised viewing.

The following have access to the images captured by the Sports Park's CCTV cameras.

- Meriden Sports Park Directors
- Meriden Parish Councillors
- Meriden Parish Council Clerk

Where third party organisations have been granted access rights to the CCTV system, these organisations must have demonstrated to the Asset Owner that they have systems in place to ensure that they comply with the requirements of the Data Protection Act. An appropriate

Information Sharing Agreement will be put in place to document the compliance of the CCTV access by any external organisations.

All third-party organisations must agree to work within the guidelines set out within this policy document, should a legal requirement for access by a third party be required, where an Information Sharing Agreement is not in place.

Prior to be given access to view footage captured by the system, all users must sign up to this policy and always act within it. Where third party organisations use the system, they will be responsible for administering access given to their employees.

Responsibility for the CCTV system

Meriden Parish Council has appointed an individual who is responsible for Data Protection Compliance, who is:

Barbara Bland – Parish Clerk

Administration of the system will be completed by the following:

Cllr Jon Barber

Storing of Images.

Images are stored in an electronic format utilising Networked Video Recorders (NVRs) to record and manage CCTV images. These images will be automatically deleted after 31 days, unless they are extracted to preserve specific events or information. Once recorded, video cannot be altered, ensuring that the audit trail is intact for evidential purposes. Recordings exported from the system are protected by a watermark and digital signature. The NVRs will automatically manage the disk space according to the retention policy. The NVRs are in a secure room, fitted with access control to prevent and monitor access to the location.

Signage

Signs are displayed at all pedestrian entry points to Meriden Sports Park to ensure that visitors are made aware of the usage of CCTV throughout the estate. These signs include contact details for CCTV enquires.

Review

This policy will be amended whenever any significant changes to the system occur. A review will be carried out bi-annually should there be no significant amendments made.



Annex A

CCTV – Request to View/Release Footage

For Internal Use Only.

Requestors Name	
Company / Organisation	
Address	
Telephone	

Reason for request	
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Date of Incident		Time of Incident	
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Location of Incident	
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Without complete details and a valid reason for access to footage, the Parish Council reserves the right to refuse requests. This is to ensure that we operate within the requirements of the Data Protection Act 1998 and the Information Commissioners Office Guidelines.

Signature of Requestor		Date	
Signature of Department Head		Date	
Signature of Information Security Manager/DPO where required		Date	

Request Accepted?	Yes No		
Airport Authority Signature		Name	
Clip Details			
Camera Numbers			

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