



CCTV POLICY

Adopted by the LPC 18 June 2018 and reviewed 16 October 2023

1. Introduction

- 1.1. Loose Parish Council ("The Council") is responsible for the management of the King George V Pavilion and Playing Field and the safety of those using the facilities.
- 1.2. The Council uses closed circuit television (CCTV) images to improve public safety; to assist in the prevention and detection of crime and public disorder; to provide short term CCTV coverage of public spaces (identified as hotspot locations for crime/disorder; to assist the Police, Community, Warden and Maidstone Borough Council (MBC) Enforcement Officers, in carrying out their regulatory, investigatory and enforcement duties.
- 1.3 The CCTV Scheme is registered with the Information Commissioner's Office (ICO) and the associated images are governed by the General Data Protection Regulation (GDPR). This policy outlines the Council's use of CCTV and how it complies with GDPR.

2. Statement of Intent

- 2.1 The Council complies with the ICO CCTV Code of Practice to ensure that the CCTV is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published on the ICO website.
- 2.2 CCTV warning signs are displayed at the site of use.
- 2.3 The original planning, design and installation of the CCTV system endeavoured to ensure that it should deliver maximum effectiveness and efficiency, however The Council cannot guarantee that the cameras will cover or detect every single incident, taking place in the area of coverage.
- 2.4 Any changes to the CCTV monitoring will be subject to consultation with Councillors and staff members at The Council.

3. Description of the CCTV System

- 3.1. The CCTV system is owned by The Council and is housed in a locked unit within the Pavilion.
- 3.2 The system consists of a number of fixed high definition cameras and a multi-channel control unit complete with built in USB drive.
- 3.3 The system does not have sound recording capability.
- 3.4 The cameras are a passive technology that only record and retain images for a short time. They are not linked to automatic decision making or facial/number plate software.
- 3.5 All recordings will be filled with accurate metadata, noting the camera location and time of the recording.
- 3.6 Any data or images sent wirelessly or via the internet, are suitably encrypted to prevent unauthorised access.
- 3.7 All authorised operators with access to images, are aware of the procedures that need to be followed, when accessing the recorded images. All operators are aware of the restrictions in relation to the access and disclosure of all recorded images.

4. Siting the Cameras

- 4.1. The cameras are sited so that they only capture images relevant to the purposes for which they have been installed (see 1.2 above).
- 4.2. Cameras have been mounted in such a way as to avoid pointing directly at nearby properties and care has been taken to ensure that reasonable privacy expectations are not violated
- 4.3. Where legitimate objections are received from occupiers of properties within the clear field of view, the Council will attempt to address these objections which may include a demonstration of typical

images obtained. If the objection cannot be addressed, measures shall be taken to fog or otherwise obscure images of the relevant property, in order to create privacy zones. In these instances, request for access to images of the property concerned in the event of a crime or incident, cannot be considered.

5. Normal Operation

- 5.1. The CCTV system is operated by the Clerks and Caretaker to The Council and monitored regularly.
- 5.2. CCTV images will be automatically recorded on a secure control unit and shall be automatically deleted after a certain suitable period.
- 5.3. Recorded images will be accessed by authorised personnel, only in the event of a qualifying incident or during routine system testing.

6. Storage and Retention of CCTV images

- 6.1. Recorded data will not be retained for any longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- 6.2. All retained data will be stored securely at all times and permanently deleted as appropriate/required.

7. Subject Access Requests (SARs)

- 7.1. Individuals have a right to request access to CCTV footage that constitutes their personal data, unless an exemption applies under the General Data Protection Regulation.
- 7.2. Individuals submitting requests will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 7.3. An authorised person (Clerk/Deputy Clerk), will then determine whether the incident warrants examination of the recording, and whether there is a reasonable likelihood that the event or evidence has been captured, by the CCTV system.
- 7.4. **The Council reserves the right to refuse to examine CCTV footage for minor or trivial events, or where dates/times cannot be provided, or if the likelihood of the event being captured by the CCTV system is low.**
- 7.5. Access to the recorded images will be restricted to those personnel authorised to view them and will not be made more widely available.
- 7.6. There will be no disclosure of recorded data to third parties other than to enforcement authorities, such as the Police, Community Wardens, MBC/KCC Enforcement Officers and other statutory organisations, where these would reasonably and lawfully need access to the data.
- 7.7. All requests must be made in writing to The Parish Clerk, Loose Parish Council, LoosePC, PO Box 634 MAIDSTONE ME17 4YR. There may be a fee for a SAR but this may be waived, in the event that images of the crime or incident are captured by the CCTV system. On receipt of the required information The Council will endeavour to provide access to the footage as soon as is reasonably practical, but in any event not more than 30 days.
- 7.8. All recordings passed onto Police etc (see point 7.6) to be logged (date, time, camera, location, date when passed on and to whom).

8. Policy Review

- 8.1. Policies, procedures, passwords and authorised personnel shall be reviewed annually and updated as necessary.

9. Complaints

- 9.1. Complaints and enquires about the operation of The Council's CCTV scheme should be directed to The Parish Clerk in the first instance (see item 7.7).

CCTV POLICY-Appendix – Tick list

Loose Parish Council (“The Council”) has considered the need for using CCTV and has decided that it is required for the following reasons:

- to improve public safety
- to assist in the prevention and detection of crime and public disorder
- to provide short term CCTV coverage of public spaces (identified as hotspot locations for crime/disorder)
- to assist the Police, Community Warden and Maidstone Borough Council Enforcement Officers, in carrying out their regulatory, investigatory and enforcement duties.

It will not be used for other purposes. The Council will conduct regular reviews of the use of CCTV.

Items to review	Reviewed Date	By	Next review due
The Clerks Office is responsible for the operation of the system			
A system has been chosen, which produces clear images that law enforcement bodies (usually the police) can use to investigate crime. These can easily be taken from the system, when required			
Councillors and staff will be consulted about any proposal to install/amend any CCTV equipment or its use, as appropriate			
Cameras have been sited so that they provide clear images			
Cameras have been positioned to avoid capturing the images of persons not visiting the premises			
There are visible signs showing that CCTV is in operation.			
Images from this CCTV system are securely stored, where only a limited number of authorised personnel have access to them			
Images recorded for Police or other agencies are to be logged – date, time, location and number of camera. Details of whom data given to and date			
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated			
Except where individually authorised, images have not been provided to third parties			
The Council has a policy for how to respond to individuals making requests for copies of their own images see point 7 above.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images			