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Closed-Circuit Television (CCTV) Policy

Model Policy for Parish & Town Councils

1. Purpose of the Policy

The Council operates Closed-Circuit Television (CCTV) systems, both external and internal, to support the safety and security of council property, employees, visitors, and the wider community. This policy sets out how CCTV is managed in accordance with the UK GDPR, the Data Protection Act 2018, the Protection of Freedoms Act 2012, the Surveillance Camera Code of Practice, and the ICO CCTV Code of Practice.

2. Legal and Regulatory Framework

The Council is the **Data Controller** for all CCTV systems it operates, Officers with day-to-day management and monitoring are **'Processors'**. Management of CCTV must comply with:

- UK GDPR
- Data Protection Act 2018
- Protection of Freedoms Act 2012 (PoFA)
- Surveillance Camera Code of Practice (Home Office)
- ICO CCTV Code of Practice

3. Scope of the CCTV System

3.1 External CCTV

External cameras may be installed on council buildings, car parks, open spaces, fencing, playing fields or other council-owned assets.

3.2 Internal CCTV

Internal cameras may be installed in council offices, Arden Hall, the Pavilion or other indoor facilities. Cameras will not be placed in areas where individuals have a heightened expectation of privacy.

4. Lawful Basis for Processing

The Council processes CCTV images under:

- Public Task
- Legitimate Interests
- Legal Obligation

5. Signage and Transparency

Clear signage will be displayed at all CCTV entry points, stating that CCTV is in operation, the purpose of the system, and the Council's contact details.

6. Operation and Management

The Clerk/RFO (or designated officer) is responsible for day-to-day management, compliance, secure storage, and system checks. The CCTV and intercom systems should only be accessed from Council owned devices while on-site. Any extraordinary circumstances where the system needs to be accessed remotely will be logged.

7. Data Retention and Storage

Recordings will be retained for a maximum of 28 days, unless required for an investigation. Extended retention must be justified and logged. Archived CCTV images will not be kept for longer than is necessary for the purpose of Police or Council evidence.

8. Requests for Disclosure

8.1 Subject Access Requests

Individuals may request access to footage in which they appear. Responses will be made within one month unless an extension is necessary.

8.2 Third-Party Requests

Disclosure to police, stakeholders or insurers must be lawful, necessary, proportionate, and logged. Stakeholders may be invited to view images if a lawful basis exists but will not be able to download them.

9. Data Protection Impact Assessment (DPIA)

A DPIA must be completed before installing new CCTV or significantly altering existing systems.

10. Security and Technical Standards

The Council will ensure secure access controls, encryption where possible, appropriate camera positioning, and regular maintenance.

11. Monitoring and Review

This policy will be reviewed annually or sooner if legislation changes or new systems are installed.

12. Complaints

Complaints should be directed to the Clerk. If unresolved, individuals may escalate to the ICO.

13. CCTV Camera Location Register

The Council maintains a register of all CCTV cameras. This register must be reviewed annually and updated whenever cameras are added, removed, or repositioned.

13.1 External Cameras

- **Camera 1 – Arden Hall 'Gas Cupboard'**

  Covers: Gas cupboard, rear staff access door, driveway leading to rear car park, partial view of Arden Hall car park, boundary fence with 53 Water Orton Road.

- **Camera 2 – Arden Hall 'Front Path WR Door'**

  Covers: exit from Windsor Room, partial of path leading to front door from Water Orton Road and driveway.

- **Camera 3 – Arden Hall 'Rubbish Bins CO'**

  Covers: rear exit from Council Office and emergency exit between Spencer and Windsor kitchens, staff / bin store area to side of building.

- **Camera 4 – Arden Hall 'AH Frontage'**

  Covers: service road of Water Orton Road in front of Arden Hall, paths to Arden Hall front entrances from service road and driveway, grassed forecourt of Arden Hall. Limited view of accessible parking next to Windsor Room.

- **Camera 5 – Arden Hall 'CO Front Door'**

  Covers: front door to council office, partial view of emergency exit stairs from the dance studio, wildflower garden, partial of access to bin stores and partial of main car park.

- **Camera 6 – Arden Hall 'Back Door'**

  Covers: rear exit of Arden Hall and partial view of main car park including loading bay and accessible parking.

- **Camera 7 – Arden Hall 'Tree'**

  Covers: accessible parking on Arden Hall frontage, tree in grassed forecourt area and path under Windsor Room window.

- **Camera 8 – Arden Hall 'AH Back Car Park'**

  Covers: most of rear car park behind Arden Hall.

- **Camera 9 – Arden Hall 'Driveway'**

  Covers: driveway from Water Orton Service Road to end corner of Arden Hall including boundary fence with 53 Water Orton Road.

- **Camera 10 – Pavilion 'Gym Equipment'**

Covers: park long view up to playgrounds & basketball hoop, gym equipment, emergency exit from Pavilion function room.

- **Camera 11 – Pavilion 'Front Door'**

  Covers: partial view of car park, entrance gate to park, open spaces bin store, RRL Catering horsebox, Pavilion car park door entry, background view of cricket outfield and Pitch 6.

- **Camera 12 – Pavilion 'Full Car Park'**

  Covers: wide-angled view of rear car park

- **Camera 13 – Pavilion 'Tennis Courts'**

  Covers: partial view of rear car park, entrance gate to park, tennis courts.

- **Camera 14 – Pavilion 'Back of Warden Office'**

  Covers: entrance to Pavilion by Facilities staff locker room, back of garages, side view of cricket nets.

- **Camera 15 – Pavilion 'Cricket Pitch'**

  Covers: hardstanding in front of garages, partial view of cricket nets, cricket pitch and partial view of pitch 5.

- **Camera 16 – Pavilion 'Park Path'**

  Covers: inside entrance gate to the park, path down to theatre workshop, wide-angled view of Pitch 6 and cricket outfield, bin and sign.

- **Camera 17 – Pavilion 'Patio'**

  Covers: external UPVC changing room doors, patio door entrance to Pavilion Function room, long view of path down to theatre workshop, picnic tables (owned by CBC&SC).

- **Camera 18 – Pavilion IP 'Play area'**

  Covers: path from Pavilion building to playgrounds, area of park between ditch and basketball net. Limited view of Junior Playground.

13.2 Internal Cameras

- **Camera 19 – Arden Hall 'Windsor Bar'**

  Covers: bar serving area in the Windsor Room, including customers coming to the bar.

- **Camera 20 – Arden Hall 'Front Door'**

  Covers: covers vestibule area at front door, noticeboard and view through the window to the path directly in front of the entrance to both main door and Windsor Room.

- **Camera 21 – Pavilion 'IP Front Door'**

  Covers: hallway leading from Pavilion function room to car park.

13.3 Intercom System

- **Camera – Rear Entry door to Arden Hall by intercom panel**

  Viewing devices: CBPC operated iPad in dance studios, panel on Arden Hall front desk.

  Access to UniFi system restricted to Clerk & Community & Leisure Officer.

13.3 Camera Register Management

- The Clerk/RFO will maintain the register.
- Any changes must be approved by Full Council or delegated committee.
- Camera locations must be included in the Council's DPIA.
- The register must be available for inspection by the ICO upon request.

14. Policy Adoption

This CCTV Policy was adopted by **Castle Bromwich Parish Council** at its meeting held on 30th September 2026 C126-122b and will be reviewed annually.