



PADSTOW TOWN COUNCIL

CCTV Policy

POLICY/PROTOCOL/PROCEDURE			
Version	Version 1	Comments	
Approval Date	25 July 2023	Responsible Officer	Town Clerk
Committee	LTOS	Approval by	Full Council

VERSION HISTORY		
Date	Version	Comments
18 July 2023	JULY 2023 draft	New Policy drafted.
25 July 2023	Version 1	Approved by FC 25 July 2023

REVIEW RECORD		
Date Review initiated	Review undertaken by i.e. officer/ Cttee/Council	Summary of any recommended updates/changes to be made

1. Introduction

- 1.1 Padstow Town Council operates a Closed Circuit Television (CCTV) surveillance system in the following locations:
 - a) Padstow Sk8 Skate Park, The Lawns Car Park, School Hill, Padstow, Cornwall PL28 8EB; and
 - b) The Lawn's Under 12s Play Area, The Lawns Car Park, School Hill, Padstow, Cornwall PL28 8EB.
- 1.2 The CCTV system is operational 24/7 and records images for the purpose of reducing anti-social behaviour in the lawns area, supporting prosecutions for criminal damage/vandalism, and improving perceptions of public safety and confidence in using the recreational facilities in this area.
- 1.3 The CCTV system is owned and managed by Padstow Town Council. The Town Council is the system operator, and the data controller for the images produced by the CCTV system. Padstow Town Council is registered with the Information Commissioner's Office, Registration number Z7106619.
- 1.4 A Data Protection Impact Assessment for the Lawns Area CCTV has been undertaken and can be viewed on the Town Council's website at <https://padstow-tc.gov.uk/your-council/council-policies-procedures/> or can be obtained by contacting the Council Offices. The Council's background documentation giving consideration to compliance and justification is also available to view upon request.

2 Scope

- 2.1 This policy identifies the objectives and purpose of the CCTV system and sets out clear procedures for the use and management of the CCTV system. This policy is to be read in conjunction with Padstow Town Council's Procedure For Accessing, Disclosing And Handling Data Retrieved From The CCTV System.
- 2.2 The CCTV system will not be used for any other purposes than those set out in this policy and images are monitored and recorded in strict accordance with this policy.
- 2.3 This policy applies to all system users, employees, and Councillors of Padstow Town Council and they will all be made aware of this policy.

3. Policy Statement

- 3.1 Padstow Town Council operates its CCTV system in a manner which respects the privacy of the people whose images are recorded.
- 3.2 The Town Council complies with the Information Commissioner's Office (ICO) and the system is maintained in accordance with the Surveillance Camera Commissioner's (SCC) Code of Practice and governing guidance. This ensures that the system is used responsibly and safeguards both trust and confidence in its continued use.

- 3.3 In its administration of the CCTV system, the Town Council complies with the General Data Protection Regulation (GDPR), the Data Protection Act 2018, and with the Padstow Town Council General Privacy Notice.
- 3.4 Data from the CCTV system is processed under GDPR 2018 Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller.
- 3.5 The CCTV system does not discriminate in any way, nor does it have any analytical software that could be used to discriminate people.
- 3.6 Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g. time, date and location) is recorded reliably, and compression of data does not reduce its quality.

4 Objectives And Purpose Of The System

- 4.1 The objectives of the CCTV system are to:
 - a) Prevent damage.
 - b) Reduce anti-social behaviour.
 - c) Increase public perceptions of safety in the Lawns area.
 - d) Increase successful convictions of offenders.
 - e) Increase public confidence in using the recreational facilities at the Lawns.
 - f) Support continued development and investment by PTC in recreational facilities which are well used and valued.
- 4.2 To ensure the CCTV system fulfils its intended purpose, the Town Council uses high quality cameras and recording equipment to ensure images can be used in the identification, apprehension and prosecution of offenders.
- 4.3 Cameras are situated to capture images relevant to the purposes for which they are installed. Coverage is restricted to the public realm and privacy intrusion is kept to a minimum by capturing only data which can reasonably be considered to support the objectives of the system as outlined above and in the locations listed in paragraph 1.1.
- 4.4 In support of the CCTV system's objectives, the system is used in an overt manner and signage is displayed throughout the locations informing the public that CCTV is in operation. Signage makes clear the system's purpose and hours of operation and identifies Padstow Town Council as the system owner and provides the Town Council's contact information.

5 Processing And Retention Of Data

- 5.1 Data collected is in the form of recorded video footage and is retained for a maximum of 30 days before it is automatically deleted by the digital management system.
- 5.2 Where an image is required to be held in excess of the 30 day retention period, for example in relation to a major incident involving civil proceedings, recordings will be held separately from the CCTV system and retained in a

lockable evidence location in accordance with the Council's Procedure For Accessing, Disclosing And Handling Data Retrieved From the CCTV System.

- 5.3 System users are restricted to specified Town Council employees and, where there is a legitimate need, to the Council's consultants or contractors such as its IT provider.
- 5.4 All system users will have relevant skills and training in the operational, technical and privacy considerations required for accessing, recording, disclosing or otherwise processing CCTV images and a record of authorised system users will be maintained.
- 5.5 The system is not monitored in real time. Real time monitoring is only permitted in extreme circumstances where a legitimate request for assistance is received from the police and authorisation is granted by the Town Clerk or in her absence the Assistant Town Clerk/Assistant RFO.
- 5.6 Cameras will be checked periodically to ensure that the images remain fit for purpose and that the date and time stamp recorded on the image is accurate. Where real time information is required to do this, appropriate regard will be given to the most suitable time to do this for example when the area is known to be have little or no activity due to the time of day or weather.
- 5.7 A full audit trail will be maintained of any real time monitoring identifying the date, time, camera, requestor, justification, timeframe, name of authoriser, and the system user.
- 5.8 Recorded data will only be accessed in accordance with Padstow Town Council's Procedure For Accessing, Disclosing And Handling Data Retrieved From The CCTV System which includes submission of a formal Application For CCTV Data Access and a data access log will be maintained. It will only be accessed for the purposes of:
 - Responding to a subject access request;
 - Investigating and responding to damage and mistreatment of Town Council property in support of the objectives outlined in paragraph 3;
 - Responding to a legitimate request from a third party organisation in support of the objectives outlined in paragraph 3 and in line with the SCC's Code of Practice.
- 5.9 Recording equipment will be kept in a secure place and only authorised access to such equipment will be permitted.

6. Review Procedure

- 6.1 There will be an annual review of the use of the CCTV system to ensure each camera can reasonably be considered to capture data which supports the objectives and purpose of the CCTV system as identified above and captures the minimum data possible to achieve these aims.
- 6.2 To help determine whether the CCTV system is delivering the benefits it has been deployed for, the Town Council will review the problems which the

system, or any addition to the system, seeks to address within 18 months of its implementation. In doing so, consideration will be given to quantitative data relating to reported incidents in the area and qualitative data through consultation with the community and the Neighbourhood Policing team.

- 6.3 Thereafter, as part of the annual review the Town Council will assess:
- Whether camera locations remain justified in meeting the stated purpose of the CCTV system and whether there is a case for their removal or relocation, including for reasons relating to environmental factors;
 - The monitoring operation, e.g if live monitoring in any camera locations has become necessary; and
 - Whether there are alternative and less intrusive methods for achieving the stated purpose of the CCTV system.
- 6.4 This policy will come into immediate effect at the point that the CCTV system goes live and will be reviewed on an annual basis thereafter.

7. Responsibilities

- 7.1 Padstow Town Council is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 7.2 The Town Council is responsible for ensuring adequate signage is erected in compliance with the ICO and the SCC Code of Practice.
- 7.3 The Town Clerk and in her absence the Assistant Town Clerk/Assistant RFO is responsible for disclosing images to data subjects and third parties and for maintaining and reviewing all logs related to the CCTV system.

8. Complaints

- 8.1 Complaints concerning Padstow Town Council's use of its CCTV system or the disclosure of CCTV images should be made in writing to enquiries@padstow-tc.gov.uk or to the Town Council Offices, Station House, Station Road, Padstow, Cornwall PL28 8DA.
- 8.2 Padstow Town Council's Complaint Handling Procedure is available to view on the Council's website at <https://padstow-tc.gov.uk/your-council/council-policies-procedures/>
- 8.3 When requested, anonymised information concerning complaints will be provided to the Surveillance Camera Commissioner.