



Thornbury Town Council

CCTV Policy at the Mundy Playing Fields and the Cemetery, Kington Lane

1. Introduction

This policy is to control the management, operation, use and confidentiality of the CCTV systems at the Town Hall, the Mundy Playing Fields and the Cemetery at Kington Lane.

It was prepared after taking due account of the Code of Practice published by the Data Protection Commissioner (revised 2008) and the 2013 Surveillance Camera Code of Practice guidelines following the introduction of the Protection of Freedoms Act 2012.

This policy will subject to periodic review by the Town Council to ensure that it continues to reflect the public interest and that it and the system meets all legislative requirements.

Thornbury Town Council accepts that the General Data Protection Regulations (2018) has several underlying principles. These include personal data:

- Must be processed fairly, lawfully and transparently.
- Is only used for a specific processing purpose that the data subject has been made aware of and no other, with further consent.
- Should be adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed.
- Must be accurate and where necessary kept up to date.
- Should not be stored for longer than is necessary, and that storage is safe and secure.
- Should be processed in a manner that ensures appropriate security and protection.

2. Statement of Purpose

To provide a safe and secure environment for the benefit of those who might visit, work or use the facilities owned or looked after by Thornbury Town Council. The system will not be used to invade the privacy of any individual, except when carried out in accordance with the law.

The scheme will be used for the following purposes:

- To reduce the fear of crime by persons using Town Council facilities, so they can enter and exit the buildings and facilities without fear of intimidation by individuals or groups.
- To reduce the vandalism of property and to prevent, deter and detect crime and disorder.
- To assist the police, the Town Council and other Law Enforcement Agencies with identification, detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime, public order or contravention of bye-laws.

- To deter potential offenders by publicly displaying the existence of CCTV, having cameras clearly sited that are not hidden and signs on display, both inside and outside Town Council buildings.
- To assist all emergency services to carry out their lawful duties.

3. Changes to the Purpose or Policy

A major change that would have significant impact on either the purpose or this policy of operation of the CCTV scheme will take place only after discussion and resolution at full council meetings.

4. Responsibilities of the Owners of the Scheme

The elected Town Council retains overall responsibility for the scheme.



Thornbury Town Council

CCTV Code of Practice

Management of the System

Thornbury Town Council has internal and external CCTV cameras at some of its locations. The system is not routinely monitored but is accessed as and when the need arises.

Day-to-day operational responsibility rests with the Clerk to the Council in conjunction with the Deputy Clerk to the Council, the Outdoor Manager, the Outdoor Supervisors and Grounds Staff.

Breaches of the policy by Town Council Staff will be investigated by the Town Clerk and reported to the Town Council.

The system operates in accordance with current legislation and prevents crime largely by increasing the risk of detection and prosecution of an offender.

This policy must be read and understood by all persons involved in this scheme and individual copies of this policy will therefore be issued for retention. A copy will also be available for reference in the secure recording areas.

Control and Operation of the Cameras, Monitors and Systems

The following points must be understood and strictly observed by operators:

1. Operators must act with due probity and not abuse the equipment or change the pre-set criteria to compromise the privacy of an individual.
2. The position and style of cameras and monitors have been sited to support our **Statement of Purpose** and the Police have been notified.
3. No public access will be allowed to the monitors except for lawful, proper and sufficient reason, with prior approval of either the Town Clerk, Deputy Town Clerk, Mayor or Deputy Mayor.
4. The Police are permitted access to tapes and prints if they have reason to believe that such access is necessary to investigate, detect or prevent crime. The Police are able to visit the sites to review and confirm the Town Council's operation of CCTV arrangements. Any visit by the Police to view images will be logged by the operator.
5. Operators should regularly check the accuracy of the date/time displayed.
6. Digital records should be securely stored to comply with data protection and should only be handled by the minimum number of persons. Digital images will be erased after a period of 30 days at both the Mundy Playing Fields and the Cemetery at Kington Lane and for **XXX** days at the Town Hall.
7. The CCTV images at the Mundy Playing Fields and the Cemetery are password protected and kept in a locked. The passwords of these systems are not permitted to be shared beyond the roles stipulated in this policy - the Town Clerk, the Deputy Town Clerk, the Outdoor Manager, the Outdoor Supervisors and the Grounds Staff. Sharing a password beyond this group is considered a breach of this policy and could lead to disciplinary action.

8. Images will not normally be supplied to the media, except on the advice of the police if it is deemed to be in the public interest. The Clerk to the Council will inform the Chair of the Council of any such action.
9. As records may be required as evidence at Court, each person handling a digital record may be required to make a statement to a police officer and sign an exhibit label. Any images that are handed to a police officer should be signed for by the police officer and information logged to identify the recording and showing the officer's name and police station. The log should also show when such information is returned to the Town Council by the police and the outcome of its use.
10. Any event that requires checking of recorded data will be clearly detailed in the logbook of incidents, including crime numbers if appropriate, and the Council Office notified at the next available opportunity.
11. Any damage to equipment or malfunction discovered by an operator should be reported immediately to their line manager or contact made with the company responsible for maintenance, and the call logged showing the outcome. When a repair has been made this should also be logged showing the date and time of completion.
12. Any request by the police for access to CCTV images to identify a specific incident must be made on an 'Access Request Form' with no charge. Any individual member of the public requesting access to their own recorded image must also be made on an 'Access Request Form' and is subject to a standard fee – currently £10, set by Government. Forms are available from the Council Office and will be responded to within 30 days (Appendix B).

Accountability

Copies of the CCTV Policy are available in accordance with the Freedom of Information Act, as will any reports that are submitted to the Town Council *providing it does not breach security needs*.

The Police will be informed of the installation and provided with a copy of this CCTV policy.

Any written concerns, complaints or compliments regarding the use of the system will be considered by the Town Council, in line with the existing complaints policy.

Thornbury Town Council has considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of customers. It will not be used for other purposes.

Thornbury Town Council will conduct an annual review of the use of CCTV on their premises **(Appendix C)**.

THIS POLICY MUST BE COMPLIED WITH AT ALL TIMES.

I have read the above policy and agree to abide by these instructions. I will discuss any concerns with the Clerk to the Council at any time.

Signed: Print Name:

Date:

(Operators are issued with their own copy of this policy and shall sign to confirm receipt and compliance.)



Thornbury Town Council

ACCESS REQUEST FORM – CCTV IMAGES

Date of Recording:	Place of Recording:	Time of Recording:	
Applicants Name: Applicants Address incl Postcode: Telephone No: Applicants Signature:		Description of Applicant and any distinguishing features (eg clothing) A necessary photograph may be necessary to aid identification.	
Reason for Request – to be submitted to Thornbury Town Council:			
<i>Continue overleaf if necessary...</i>			
Received by:	Clerk's Signature:	Date Received:	Time Received:
Request Approved: YES / NO		Date Applicant Informed:	
Fee Charged / N.A.		Fee Paid:	

£10 payable to Thornbury Town Council. A printed A4 CCTV image will be provided within 40 days if application is approved by the Town Council. BACS details supplied on request.



Thornbury Town Council

CCTV System Annual Review

This CCTV system and images produced by it are controlled by Thornbury Town Council who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

Thornbury Town Council has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of the public. It will not be used for other purposes. The Town Council will conduct an annual review of the use of CCTV at its sites.

	Checked (Date)	By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.			
There is a named individual who is responsible for the operation of the system at each site.			
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.			
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. Where it is not obvious who is responsible for the system, contact details are displayed on the sign(s).			
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.			
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 for law enforcement bodies, images will not be provided to third parties.			
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.			
Regular checks are carried out to ensure that the system is working properly and produces high quality images.			