Lilbourne Parish Council

LILBOURNE PARISH COUNCIL CCTV POLICY

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1. Introduction

1.1 Lilbourne Parish Council, recognises the importance of effective and secure CCTV

1.2 This policy outlines the guidelines and responsibilities for the appropriate use of CCTV resources operated by the Parish Council

1.3 The policy has been written taking into account best practice and guidance as circulated by the Information Commissioner's Office.

2. Purpose and Scope

2.1 The Parish Council operates a limited CCTV system for the purposes of:

- Crime Prevention and Detection
- Enhancing Community Safety
- Protecting Council Property and Assets
- Assisting law enforcement where appropriate

2.2 This Policy applies to all CCTV equipment installed or operated by the Parish Council in public spaces for which the Parish Council is responsible and is listed below:

- Lilbourne Village Hall Car Park
- Lilbourne Community Minibus

2.3 This policy does not cover domestic CCTV or private systems

3. Lawful Basis for Processing

3.1 The Parish Council processes CCTV footage under the lawful basis of public task, as defined in Article 6(1)(e) UK GDPR.

3.2 Processing is necessary for the Parish Council to perform tasks carried out in the public interest, specifically, community safety and crime prevention.

3.3 Where footage is shared with law enforcement, processing may also fall under legitimate interests or legal obligations, depending on the circumstances.

4. System Description

4.1 The CCTV system consists of:

- Fixed Cameras located at the Parish Council's owned sites

- Mobile Cameras located in the Community Minibus

4.2 Fixed cameras record continuous footage across owned sites

4.3 Mobile cameras record continuous footage while the Community Minibus is in operation / in use.

4.4 Cameras do not use facial recognition or automated decision-making technologies.

4.5 Cameras are positioned to avoid unnecessary intrusion into private homes, gardens, or areas where people have a heightened expectation of privacy.

5. Data Protection Principles

5.1 The Parish Council complies with the UK GDPR and Data Protection Act 2018, ensuring that the use of CCTV is:

- Lawful, Fair and Transparent
- Purpose limited
- Data minimised
- Accurate
- Stored for no longer than necessary
- Secure

5.2 These principles reflect the Information Commissioner's Office guidance on CCTV and video surveillance.

6. Signage and Public Awareness

6.1 The Parish Council ensures that clear and prominent signage is displayed in all areas covered by CCTV.

6.2 Signage includes:

- The fact that CCTV is in operation
- The Parish Council is the data controller
- Contact details for enquiries

6.3 This meets the ICO expectations for transparency and public awareness.

7. Data Retention

7.1 Footage is retained for a maximum of 30 days unless:

- It is required for an ongoing investigation
- It has been lawfully requested by the police
- It is needed to respond to a subject access request (SAR)

7.2 After the retention period, footage is automatically overwritten.

8. Access and Disclosure

8.1 Access to the CCTV footage and this is strictly limited to authorised personnel appointed by the Parish Council

- Parish Council Clerk
- Chair of the Parish Council or Vice Chair of the Parish Council
- Deputy CCTV Manager
- Police Liaison Representative
- Minibus Administrator

8.2 Footage may be disclosed to:

- Police or law enforcement agencies, upon written request.
- Insurance providers, where necessary for claims.
- Individuals, where required under a valid SAR (subject to redaction obligations)

8.3 Disclosure is always:

- Logged
- Assessed for necessity and proportionality
- Compliant with ICO guidance on sharing CCTV with law enforcement.

8.4 Enquiries concerning CCTV must initially be through the Parish Clerk, but may be subsequently actioned through two members of the Parish Council and may involve law enforcement representatives.

8.5 Members of the public, whether or not they are representatives of organisations using any premises located on the Parish Council's property, are not routinely permitted to view recordings.

8.6 A record will be kept of the date and time any footage is copied and removed from the CCTV system, and will include:

- The Parish Council representative providing the CCTV material and,
- The name, organisation and signature of the person receiving the CCTV material, along with any reference such as a crime number where applicable.

8.7 Where access is denied, a record will be kept and will include the date and time of the request and the reason for denial.

8.8 The Parish Council Data Controller will retain a copy of the form electronically.

8.9 The form will be stored for a period not less than 7 years from the date of provision.

9. Subject Access Requests (SAR's)

9.1 Individuals have the right to request access to footage in which they appear.

9.2 The Parish Council will:

- Respond within one month.
- Verify identity before releasing footage.
- Redact third-party images where required (e.g. blurring), in line with ICO SAR guidance for CCTV.
- Refuse requests only where exemptions apply (e.g. Ongoing police investigations)

9.3 All requests will be submitted to the Parish Clerk

10. Security and Storage

10.1 The Parish Council will ensure that:

- CCTV systems are password-protected.
- Footage is stored in encrypted form where supported.
- Access is restricted to authorised users only.
- Equipment is maintained and kept in good working order.
- Any faults or breaches are reported immediately to the Parish Clerk.

10.2 These measures reflect ICO expectations for CCTV security and access control

11. Data Protection Impact Assessment (DPIA)

11.1 A DPIA has been completed for the CCTV system and is reviewed:

- Annually.
- When new cameras are installed.
- When system changes may increase privacy risk.

11.2 The DPIA assesses necessity, proportionality, alternatives and risks in line with ICO guidance.

12. Complaints

12.1 Individuals who have concerns about the Parish Council's use of CCTV may:

- Contact the Parish Clerk in the first instance
- If unresolved, raise concerns with the Information Commissioner's Office (ICO)

13. Policy Review

13.1 This policy will be reviewed annually or sooner if:

- Legislation changes
- The ICO updates its guidance (as currently under review following the Data (Use and Access) Act 2025.
- The Parish Council installs new CCTV equipment.

14. Contact

14.1 Data Controller Lilbourne Parish Council

14.2 For all enquiries or assistance, individuals can contact the Clerk to the Parish Council.

15. Adoption of Policy

15.1 Date of Adoption:__/__ /___at a meeting of the Parish Council on __/__/___(include link to minute reference)_____