

# Kings Hill Parish Council - Comprehensive CCTV Policy

---

## 1. Purpose

The CCTV system is installed to enhance the safety and security of staff, visitors, and property; deter and detect crime, anti-social behaviour, and vandalism; and support the management of the premises, including car park monitoring.

## 2. Scope

This policy applies to all CCTV systems installed at the Community Centre, covering internal communal areas (entrance, corridors, hallways) and external areas including the car park, entrances, and perimeter.

## 3. Legal Basis

The system is operated in accordance with the Data Protection Act 2018, UK GDPR, and the Surveillance Camera Code of Practice.

## 4. System Operation

Cameras operate 24/7 and record continuously. The system is monitored and maintained by authorised personnel only.

## 5. Data Retention

Recorded footage is stored securely and retained for a maximum of 30 days unless required for investigation or legal proceedings. After the retention period, footage is automatically deleted unless flagged for review.

## 6. Access to Footage

Access is restricted to authorised staff (Clerk, Deputy Clerk, and designated personnel). Requests by third parties (e.g., police) must be formally submitted and approved. Individuals may request access to footage of themselves under data protection laws.

## 7. Access Logs

All access to CCTV footage is logged, including date, time, and purpose. Logs are reviewed periodically to ensure compliance and accountability.

## 8. Signage

Clear signage is displayed at all entry points and within the premises to inform individuals that CCTV is in operation.

## **9. Data Protection and Privacy**

Cameras are not installed in private areas such as toilets. All data is handled in accordance with the Council's Data Protection Policy. The Clerk serves as the Data Protection Officer and oversees compliance.

## **10. Training**

All authorised personnel receive training on data protection and privacy obligations, appropriate use and access protocols, and incident reporting. Refresher training is provided annually or following system updates.

## **11. Complaints Procedure**

Complaints regarding the CCTV system or its operation should be submitted in writing to the Clerk. Complaints will be acknowledged within 5 working days and investigated promptly. ICO contact details: <https://ico.org.uk>, Helpline: 0303 123 1113.

## **12. Review and Oversight**

This policy will be reviewed annually or following any significant changes to the system.

## **13. Data Protection Impact Assessment (DPIA)**

A DPIA is required for the CCTV system, particularly because the system may capture images of children and other vulnerable individuals. The DPIA must be conducted prior to installation and reviewed annually. It should cover lawful basis (legitimate interests), necessity and proportionality, risks to individuals' rights, mitigation measures, and SAR handling. Responsibility rests with the Clerk/Data Protection Officer. The DPIA must align with ICO guidance and the Surveillance Camera Code of Practice.