

Paulton Memorial Park Charity (PMPC)

CCTV Installation – Policies and Procedures

Definitions

SYSTEM OPERATOR

The body that takes a decision to deploy a surveillance system is responsible for defining the purpose, the control of its use and the processing of personal data. The system operator of the PMPC CCTV System is Paulton Parish Council, the corporate Trustee of the Charity. The Parish Council will operate the system on behalf of PMPC.

SYSTEM USERS

The persons employed by the System Operator with access to live or recorded images. The System Users of the PMPC CCTV System are the Parish Clerk, together with the Chairman and Vice-Chairman of the Parish Council.

THE CONTRACTOR

Apollo Technology Limited.

GUIDING PRINCIPLES

12 principles which must be used to guide the use of the system (see Part 2).

THE PMPC CCTV SYSTEM

The ten cameras, DVR, cabling and internet switch located at Paulton Memorial Park, Village Hall and the Council office located in the village hall. (See Appendix 1).

PRIVACY IMPACT ASSESSMENT

Privacy impact assessments (PIAs) are a tool that used to identify and reduce the privacy risks of a project with regard to personal data. A PIA can reduce the risks of harm to individuals through the misuse of their personal information. It can also help organisations design more efficient and effective processes for handling personal data.

PERSONAL DATA

Data that can identify an individual and/or that can be used to inform actions or decisions that affect them.

CCTV POLICY

The aim and purpose of the CCTV system and the guiding principles to be applied to it.

CCTV PROCEDURES

The detailed procedures assigned to the System Users which are to be followed in operating the system.

CCTV Policy

Purpose of the CCTV System

Paulton Parish Council, as the Trustee of the PMPC has a legitimate aim to ensure the safety of all users of the park and to prevent crime on the premises. The purpose of the PMPC CCTV System is to record images in a defined area of the park and buildings in the interests of crime prevention and public safety.

Guiding Principles

This policy has been developed to ensure that the guiding principles set out in the Home Office Surveillance Camera Code of Practice (June 2013) are adhered to. The guiding principles are (responses in **bold**):

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need. **The purpose and aim have been articulated and will be kept under review.**
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified. **The system is set up to record data only on the premises of the Park and will only be used for the detection of crime.**
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints. **There is clear signage at the site (5 signs) which shows a contact point.**
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used. **The Parish Clerk is responsible, together with the Chairman and Vice-Chairman of the Parish Council, as the System Users, for the collection of images and their use.**
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them. **There are clear rules for the use of the system and these have been communicated to the tenants of the Park and to other interested stakeholders (the Police).**
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged. **The system is designed to record images and hold them until the storage is full at which time the system will overwrite previous images. The period of retention is commensurate with the length of time it may take for possible offences to come to light.**
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes. **Only the System Users are able to access image information and will only disclose images for law enforcement purposes. The contractor is able to provide a backup service in the event of an extended period of non-availability of the System Users.**
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards. **This principle does not apply in this case as the system is a single stand-alone system operated by the Parish Council.**

9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use. **The system is stored in a locked cupboard and in a locked room. Access to the system is protected by password protocols.**

10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published. **An annual review and audit will be carried out by the System Users which will be submitted to the System Operator for approval.**

11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value. **The system will be inspected monthly to ensure that images are of evidential value and that time and date stamps are working.**

12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date. **No reference database is to be used for matching purposes.**

Overarching Policy

The CCTV system is to be used to achieve the stated aim and purpose of the system. It is the policy of Paulton Parish Council, acting as the authorised System Operator, to comply with the aim and purpose and the guiding principles above.

The System Users are required to ensure that the CCTV Procedures are followed and that the CCTV Policy is kept under review.

CCTV Procedures

The Parish Clerk, together with the Chairman and Vice-Chairman of the Parish Council, are the designated System Users.

Security

The CCTV system is to be kept under lock and key at all times and is only to be accessed by the System Users or the installing contractor – Apollo Technology.

Password protection is to be used to ensure unauthorised access is denied both at the site and from remote access.

Requests for Data

Requests for data are likely to come from two sources:

The Police when investigating a potential crime

An individual or individuals requesting information through a complaint or subject access request

These are the only reasons that data may be released and this must always be carried out by the System Users or, in cases of their absence, the contractor. The contractor may only be approved access to release data with the agreement of the Chairman of the PMPC Trustees.

Data will be saved to a removable disk and only that data which provides the information required is to be saved to a removable disk.

A log of information provided as a result of a request is to be maintained by the System Users. Removable disks are to be labelled clearly and a record kept of their whereabouts. Removable disks must be cleared of data when it is no longer required.

Data Reliability

The system is to be checked every month to ensure that:

Data can be transferred to a removable disk.

Data quality is suitable for the purposes of crime detection and cameras cover the area required and no additional areas.

Time stamps are up to date

Data Controller Register

The ICO register of data controllers is to be kept up to date by the System Operator (the next review is due in December 2017).

Privacy Impact Assessment (PIA)

The PIA is to be reviewed annually with the first review due on 1st April 2018.

Policy and Procedures Review

This Policy is to be kept under annual review and the first review is due in April 2018.