

Heighington Parish Council

CCTV policy

Document Ref: POL/CCTV

Status: Draft

Version: 2.0

Date of approval: 13/10/25

Minute reference: 120/M/25 a

Date of next review: October 2027

Version Control:

Version: 2.0

Amended by: Clerk

Amendments: Review following installation of CCTV at Jubilee Hall and amendment of CCTV at Station Road. Review of best practice examples used by other local councils and ICO guidance.

Date approved: 13/10/25

Minute reference: 120/M/25 a

Version: 1.0

Document creation by: Clerk

Date approved: 13/09/21

Minute reference: 91/M/21

1. Introduction

- 1.1 Heighington Parish Council (the 'Council') uses closed circuit television (CCTV) images to ensure a safe and secure environment for employees and for visitors to our premises, and to protect the Council's property.
- 1.2 This policy sets out the use and management of the CCTV equipment and images in compliance with the General Data Protection Regulations (GDPR) and the Information Commissioner's Office CCTV Code of Practice.
- 1.3 The Council's CCTV facility records images only. There is no audio recording.

2 Purpose of having CCTV

- 2.1 The Council has installed and is using CCTV systems to:
 - Assist in the prevention or detection of crime or equivalent malpractice.
 - Assist in the identification and prosecution of offenders.
 - Monitor the security of the Council's premises and assets.
 - Ensure public safety.

3 Responsibilities

- 3.1 The Data Controller for the CCTV is Heighington Parish Council, Jubilee Hall, High Street, Heighington, Lincoln, LN4 1JS.
- 3.2 The Council is the CCTV operator, with delegated responsibility to the Clerk.
- 3.3 The Clerk, RFO and Admin Assistant are the only people who have permission to operate the CCTV system and to view CCTV footage or stills. Other persons must seek authorisation from the Data Controller.
- 3.4 Any complaints or enquiries about the operation of the council's CCTV system(s) should be addressed to the Clerk.
- 3.5 The CCTV is maintained by the Council using a specialist contractor.

4 Location of cameras

- 4.1 Cameras are located at strategic points throughout the Council's premises (namely Station Road pavilion and the Jubilee Hall), including at the entrance and exit points. The cameras have been positioned so that they cover communal or public areas on and around its premises and they have been sited so that they provide clear images.
- 4.2 Cameras will be sited in such a way that they only monitor those spaces that are intended to be covered by the equipment. No camera focuses, or will focus, on toilets, shower facilities, or

changing rooms.

4.3 All cameras are also clearly visible.

4.4 Appropriate signs are prominently and clearly displayed so that employees, volunteers, clients, customers, and other visitors are aware they are entering an area covered by CCTV.

5 Recording and retention of images

5.1 Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

5.2 Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the Council dictates.

5.3 As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than three months.

5.4 Once a hard drive has reached the end of its use, it will be erased prior to disposal. Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant.

5.5 In normal circumstances, this will be a period three months. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

6 Access to and disclosure of images

6.1 Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

6.2 The images that are filmed are recorded and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to relevant law enforcement agencies who are authorised to view them in accordance with the purposes of the system.

6.3 Viewing of recorded images will take place in a restricted area. If media on which images are recorded are removed for viewing purposes, this will be documented.

6.4 Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.

- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Line managers involved with Council disciplinary processes.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).
- Maintenance technicians accessing the CCTV under the request of the council.

- 6.5 The clerk or acting clerk (or chair in their absence) is the only person who is permitted to authorise disclosure of information to external third parties such as law enforcement agencies.
- 6.6 All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

7 Individuals' access rights

- 7.1 Under the GDPR, individuals have the right on request to receive a copy of the personal data that the Council holds about them, including CCTV images if they are recognisable from the image.
- 7.2 If you wish to access any of your CCTV images, you must make a written request to the Parish Office. Your request must include the date and time when the images were recorded and the location of the particular CCTV camera, so that the images can be located, and your identity can be established as the person in the images. Note: The council will always check the identity of the person making the request before processing it.
- 7.3 The Council will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.
- 7.4 If the Council is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

8 Staff training

- 8.1 The Council will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the GDPR with regard to that system.