Milton Parish Council
Code of Practice for CCTV

1. Introduction

The aim of this Code of Practice is to ensure that Council staff involved in running the CCTV system understand the principles which govern the operation of Milton Parish Council CCTV cameras.

The purpose of CCTV cameras within and around Council buildings is to improve security and provide additional protection to staff and visitors.

This Code of Practice sets out the aims of the Parish Council CCTV system and how it will be used. A copy of this Code of Practice is made available to all staff.

The systems will not be used for any other purpose than those set out in this document without prior notification to staff.

The day-to-day management of the CCTV systems within the Parish Office is the responsibility of the Clerk and/or Deputy Clerk.

2. Legislation

CCTV operations are subject to:

- Data Protection Act 2018
- UK General Data Protection Regulation (UK GDPR)
- Human Rights Act 1998
- CCTV Subject Access Requests (SARs) (See Item 9)
- Regulation of Investigatory Powers Act 2000
- Council policies, procedures and guidelines
- Data (Use and Access) Act 2025
- The Surveillance Camera Code of Practice (Section 29 of the Protection of Freedoms Act 2012) (See Item 5)

Lawful Basis for Processing

The lawful basis for processing personal data via the CCTV system is:

- Article 6(1)(e) – Public Task
- Article 6(1)(f) – Legitimate Interests, where applicable

3. Data Protection Impact Assessment (DPIA)

An annual DPIA will be completed and approved by the Parish Council. It will assess:

- Necessity and proportionality of each camera
- Privacy impact of staff, visitors and neighbours
- Alternative measures considered
- Justification for audio recording
- Justification for 24/7monitoring
- Risk mitigation measures
- Signage and transparency
- Access controls and audit logs

4. CTV Operation

4.1 Purpose of the CCTV System

The objectives of the CCTV system are:

- Enhancing premises security
- Protecting staff and visitors
- Deterring and detecting crime
- Assisting in identifying offenders
- Discouraging aggressive or violent behaviour
- Reducing fear of crime
- Providing evidence in disciplinary cases

The system **will not** be used to monitor flexi-time or absences.

4.2 Privacy

Recordings will only be reviewed where concerns exist regarding an offence or serious breach of discipline.

Unauthorised use of CCTV images is gross misconduct.

5. Audio Recording

Audio recording is used **only** within the Parish Office.

5.1 Justification

Audio recording is used solely for staff safety, crime prevention and serious incident investigation.

5.2 Safeguards

- Signage must state **"Audio recording in progress"**
- Access restricted to the Clerk/Deputy Clerk with the Chairman or Vice-Chairman
- Audio reviewed only for serious incidents
- Audio not used for performance monitoring

External cameras do **not** record audio.

6. Camera Location and Coverage

External cameras monitor:

- Building entrances and exits
- External walls and access points
- Surrounding areas such as carparks and pathways directly serving the office

Cameras are positioned to:

- Avoid neighbouring private property
- Minimise intrusion into irrelevant public areas
- Avoid audio recording externally

Internal and external camera locations are listed in Appendix 1.

7. Transparency and Signage

Milton Parish Council ensures transparency by:

- Displaying **clear CCTV signage** at entry points and monitored areas
- Informing individuals of the purpose of monitoring
- Indicating where audio recording is in use

8. Data Protection and Privacy Safeguards

The Council ensures:

- CCTV use is limited to stated purposes
- Footage is adequate, relevant, and not excessive
- CCTV is not used for general surveillance
- 24/7 monitoring is justified due to building access outside officer hours
- Monitoring is not used for staff performance assessment unless it is justified in exceptional circumstances.

9. Viewing Images and the Provision of Evidence

Requests to view images may be made by the police or the Staffing Committee.

Authorisation must be given by the Clerk or Deputy Clerk with the Chairman or Vice-Chairman.

All viewings and releases must be logged, including:

- Date and time
- Purpose
- Authoring officer
- Chain-of-custody record

Footage must be redacted where necessary and transferred securely.

10. CCTV Subject Access Requests (SARs)

Individuals may request footage of themselves.

The Council will:

- Respond within one calendar month
- Verify identity
- Redact third-party images
- Provide footage securely
- Refuse requests where disclosure would prejudice investigations

11. Regulation of Investigatory Powers Act 2000 (RIPA)

The purpose of this order is to ensure that all staff are fully aware of RIPA and how it applies to surveillance and other covert monitoring. RIPA sets out the authorisation requirements for all covert surveillance carried out by public authorities where that surveillance is likely to result in the obtaining of private information about a person. This can include observing or listening to persons. Covert monitoring is prohibited in the UK when it infringes on individual rights to privacy.

12. Breaches of the Code of Practice

Breaches will be investigated by the Clerk or Deputy Clerk.

CCTV-related data breaches must be:

- Reported to the ICO within 72 hours
- Recorded in the CCTV breach register
- Notified to affected individuals where risk is high

13. Recording Systems and Image Control

The CCTV system uses digital recording.

CCTV images are not to be retained for longer than necessary. This will normally be a maximum of 30 days.

Evidential footage will be retained in a separate temporary file for the period of the investigation or prosecution and then be deleted.

All memory sticks must be encrypted and logged. Audit logs must be retained for six years.

14. Disciplinary Offences

Tampering with cameras, monitoring or recording equipment, images or recorded data by staff will be regarded as gross misconduct and will lead to disciplinary action, which may result in dismissal or criminal prosecution.

15. Complaints

Formal complaints about the operation of a system should be addressed to the Parish Council. Formal complaints will be dealt with in accordance with the Council's complaints procedure.

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Version 2: 4 July 2022
Version 3: 4 November 2024
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Author: Clerk with AI assistance

Appendix 1

Locations of external and internal cameras



1. **Front Parish Council Office**
2. **Front of Scout Hut**
3. **Rear of Parish Council Office**
4. **Inside the Parish Council Office**

Appendix 2

CONFIDENTIALITY STATEMENT AND UNDERTAKING

I understand that, as a councillor or as part of my contract of employment with the Council, I will be required to operate Closed Circuit Television monitoring and recording equipment (CCTV equipment) installed as part of the Council building security arrangements.

I confirm that I have had explained to me and fully understand the importance of operating and using the CCTV equipment entirely in accordance with the Code of Practice and all other instructions governing this issued to me from time to time. I understand the need to maintain confidentiality about events and/or staff or public movements seen or recorded by the CCTV equipment, unless required or authorised to disclose these in accordance with the Code of Practice.

I therefore undertake not (except in the proper course of my duties with the Council and as required or authorised by the Code of Practice), during or after my period of employment with the Council, to divulge to any person whatsoever or otherwise make use of (and will use my best endeavours to prevent the improper publication, disclosure or use of) any information about events and/or staff or public movements seen or recorded by the CCTV equipment.

I understand that any breach of this undertaking, the Code of Practice or other instructions concerning the use or operation of the CCTV equipment may amount to gross misconduct and will result in disciplinary action which may lead to my dismissal. I also understand that, if such breaches involve the supply of information or material to a third party for gain or reward, the Council will be entitled to the return of any payment (actual or in kind) received by me and will take legal action to enforce this.

Signed..... Name.....

Dated.....

In the presence of (signature and name of witness).....