

TONGHAM PARISH COUNCIL

CCTV POLICY DOCUMENT

Principle One

: '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;.

1. Have we translated Principle one into clear objectives?
 - To prevent damage to property i.e. the Tongham Community Centre thus protecting public funds
 - To prevent injury to any person within the area of the TCC.
2. Do we regularly review the system and assess against the objectives?
 - Annual review to be put in place; sheet in CCTV folder to be completed and signed by TPC Chair and Clerk.
3. Have you considered the requirements of the end user?
 - Yes – security of the building and the users of the building and surrounding area.
4. Is the system being used for any other purpose than those specified?
 - No
5. Have you identified any areas where further action is required to more fully conform with the requirements of Principle One?
 - Yes; annual review required. See CCTV folder in Parish office.

Principle Two

'The use of a surveillance camera system must take into account the effect on individuals and their privacy, with regular reviews to ensure their use remains justified;'

1. Do we review our system annually:
 - Strategy put in place January 2015
2. Have we conducted a privacy impact assessment?
 - Ongoing.
3. Do we publish our privacy impact assessment and annual review?
 - This will be done – first review January 2015, to be published February 2015.
4. Have we identified any areas where further action is required to more fully conform with Principle Two?
 - No.

Principle Three

'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'.

1. Does signage exist highlighting the use of a surveillance camera?
 - Yes
2. Does the signage highlight the point of contact?
 - Yes
3. Has there been a proportionate consultation and engagement with the public and partners to establish that there is a legitimate aim and a pressing need for the surveillance camera system?
 - Yes
4. Is the surveillance system a proportionate response?
 - Yes
5. Does your publication of information include the procedures and safeguards that are in place, impact assessments undertaken, performance statistics and other management information?
 - Yes – that is the intention. NB to be published February 2015.
6. Do you have a complaints procedure in place?
 - Ongoing.
7. Do you make the public aware of how to escalate complaints?
 - Information will be on website.
8. Is there a defined time scale for acknowledging and responding to complaints and is this conveyed to the complainant at the outset?
 - Will be on website.
9. Do you publish the number and nature of complaints received?
 - Will do so on TPC website.
10. Have you identified any areas where further action is required to more fully conform with the requirements of Principle Three?
 - Yes – information as specified to be published on TPC website. Details to be discussed with the Parish Councillors and included in Policy.

Principle Four

'There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.'

1. What arrangements are in place to provide clear responsibility and accountability?
 - The Parish Council are the responsible body; the Clerk in the first instance OR the TCA committee may be approached. Ultimately the responsibility lies with Tongham PC.
2. Are all staff aware of their responsibilities?
 - Yes

3. Please explain how you ensure the lines of responsibility are adhered to.
 - The Clerk is the initial point of contact, escalating upwards to the Councillors and Chairman.
4. If jointly owned, is it clear what each partner/organisation is responsible for and what the individual obligations are?
 - Not applicable.
5. Have you identified any areas where further action is required to more fully conform with the requirements of Principle Four?
 - No.

Principle Five

'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'.

1. Do you have clear policies and procedures which help ensure that any legal obligations affecting the use of such a system are addressed?
 - Ongoing.
2. Do you follow a quality management system?
 - Ongoing
3. Are the rules, policies and procedures part of an induction system for all staff?
 - Yes.
4. How do you ensure that all system users remain up to date and efficient with relevant operational, technical, privacy considerations, policies and procedures?
 - Use an outside company.

5 – 9

- As an outside company is used, these questions are not applicable; our policy document will be provided to that Company.

Principle Six

'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 purpose has been discharged'.

1. On what basis are images retained and for how long?
 - Retained pending damage/crime reports. How long? – to check, ongoing.
2. Do we have an auditable process for reviewing images and managing their retention?
3. Are there any time constraints in the event of the enforcement agency not taking advantage of the opportunity to view the retained images?
4. Are there any time constraints which might affect external parties from viewing the images?

5. Do you quarantine all relevant information and images relating to a reported incident until such time as the incident is resolved and/or all the information and images have been passed on to official third parties?
6. Have you identified any areas where further action is required to more fully conform with the requirements of Principle Six?

NB To contact Gordon Tyerman on all these queries.

Principle Seven

'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'.

1. Do you have a policy on who has access to the stored information?
 - Relevant 3rd parties and this organisation
 - Only to relevant 3rd parties where information and/or images are relevant following an incident or for law enforcement purposes
 - Reporting procedures and accurate record keeping to Parish Clerk and/or the Company managing the CCTV system.

Principle Eight

'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'.

- Again, these questions would fall under the remit of the Company. GT to be approached.

Principle Nine

'Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use'.

1. What security safeguards do you have in place to ensure the integrity of images and information?
 - Records and equipment are stored in a safe within a locked office; access is restricted to a small circle of known users.
2. If the system is connected across an organisational network or intranet, do sufficient controls and safeguards exist?
 - GT to be asked.
3. What is the specified purpose for which the information/images are being used and accessed and is this consistent with the stated purpose?
 - GT to be asked.
4. Do you have preventative measures in place to guard against misuse of information and images?
 - GT to be asked.
5. Are your procedures and instructions and/or guidelines regarding the storage, use and access of surveillance system information documented?

- Will be on record sheet in CCTV folder.
6. Any other action identified?
- Yes – see 5 – to be included on record sheet in CCTV folder.

Principle Ten

‘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’.

1. Does your system have a review process that shows it still addresses the needs and delivers the benefits that justify its use?
 - Yes.
2. Have you identified any cameras that do not remain justified in meeting the stated purposes?
 - No
3. Have you conducted an evaluation in order to compare alternative interventions to surveillance cameras?
 - At the time the cameras were installed, costs of security guards were investigated; in terms of value for money CCTV was the best value solution.
4. Is it cost effective to continue running your surveillance camera system?
 - Yes. Vandalism has cost the PC a considerable amount of money in the past.
5. Any further actions?
 - To be included in policy – ie need/cost/review mechanism.

Principle Eleven

All questions on quality of imaging; GT to be asked.

NB to be included in Policy.

Principle Twelve

All questions specialist – GT to be asked.

NB to be included in Policy.

Tongham Parish Council

Policy Surveillance Camera System

The Surveillance Camera System (CCTV) was brought into place as a result of vandalism and to safeguard the public building, users, and public funds.

Information will only be shared with relevant third parties and will only be shared where information/images are relevant to an incident.

Complaints should be made to the Parish Clerk in the first instance, then will be formally presented to the Chairman.

Information on how to complain, and an annual review, will be published on the TPC website.

The CCTV system will be reviewed annually, to include:

- Is there still a need for the system?
- Are all camera units justified?
- Is the system still cost effective?
- Is the system updated and maintained regularly?

TONGHAM PARISH COUNCIL

CCTV Policy

This Policy is to control the management, operation, use and confidentiality of the CCTV system at Tongham Community Centre, Poyle Road, Tongham GU10 1DU. It was prepared after taking due account of the Code of Practice published by the Data Protection Commissioner (July 2000). This policy will be subject to periodic review by the Parish Council to ensure that it continues to reflect the public interest and that it and the system meets all legislative requirements. The Parish Council accepts the principles of the 1998 Act based on the Data Protection Principles as follows:

- data must be fairly and lawfully processed;
- processed for limited purposes and not in any manner incompatible with those purposes;
- adequate, relevant and not excessive'
- accurate;
- not kept for longer than is necessary;
- processed in accordance with individuals' rights;
- secure;
- not transferred to countries with inadequate protection;
- subject to guidance on good practice.

The following sections address:

- Management of the Purpose of the CCTV facility
- CCTV Code of Practice
- Accountability

This policy will be reviewed every four years or earlier if so required by legislation or additional material.

This Policy was reviewed by Tongham Parish Council on 2 February 2015.

Statement of Purpose:

To provide a safe and secure environment for the benefit of those who might visit, work or live in the area. The system will not be used to invade the privacy of any individual, except when carried out in accordance with the law. The scheme will be used for the following purposes:

- to reduce the fear of crime by persons using Council facilities so they can enter and leave the buildings and facilities without fear of intimidation by individuals or groups;

- to reduce the vandalism of property and to prevent, deter and detect crime and disorder;

- to assist the police, other Law Enforcement Agencies and the Parish Council with identification, detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime, public order or contravention of bye-laws;

- to deter potential offenders by publicly displaying the existence of CCTV, having cameras clearly sited that are not hidden and signs on display, both Parish Council buildings and Playing Fields.

- to assist all “emergency services” to carry out their lawful duties.

Changes to the Purpose or Policy: A major change that would have a significant impact on either the purpose or this policy of operation of the CCTV scheme will take place only after discussion at Council Committee meeting(s) and resolution at full Council meeting. All agendas are posted on

the Parish Council notice board at least 3 clear days excluding weekends before Council meetings.

Responsibilities of the Owners of the Scheme: Tongham Parish Council retains overall responsibility for the scheme.

CCTV Code of Practice: Management of the System Day-to-day operational responsibility rests with the Tongham Community Centre management committee , who can be consulted by staff out of hours, if and when necessary. Breaches of this policy by operators will be investigated by the Clerk to the Council and reported to the Parish Council. A CCTV system prevents crime largely by increasing the risk of detection and prosecution of an offender. Any relevant tape or digital evidence must be in an acceptable format for use at Court hearings. This policy must be read and understood by all persons involved in this scheme and individual copies of this policy will therefore be issued for retention. A copy will also be available for reference in the secure recording area(s). Control and Operation of the Cameras, Monitors and Systems. The following points must be understood and strictly observed by operators: 1. Trained operators must act with due probity and not abuse the equipment or change the pre-set criteria to compromise the privacy of an individual. 2. The position of cameras and monitors have been agreed following consultation with the police and security consultants in order to comply with the needs of the public. 3. No public access will be allowed to the monitors except for lawful, proper and sufficient reason, with prior approval of the Clerk of the Council or the Chairman of the Parish Council. The Police are permitted access to tapes and prints if they have reason to believe that such access is necessary to investigate, detect or prevent crime. The Police are able to visit the Council Office(s) to review and confirm the Parish Council's operation of CCTV arrangements. Any visit by the Police to view images will be logged by the operator. 4. Operators should regularly check the accuracy of the date/time

displayed. 5. Tapes/digital records should be securely stored to comply with data protection and should only be handled by the essentially minimum number of persons. VCR tapes will be used in strict rotation and retained for a maximum of 15 days and used for a limited number of times before replacement to ensure quality images are captured. Digital images will be erased after a period of 45 days. 6. Images will not normally be supplied to the media, except on the advice of the police if it is deemed to be in the public interest. The Clerk of the Council would inform the Chairman of the Council of any such emergency. 7. As records may be required as evidence at Court, each person handling a tape/digital record may be required to make a statement to a police officer and sign an exhibit label. Any images that are handed to a police officer should be signed for by the police officer and information logged to identify the recording, and showing the officer's name and police station. The log should also show when such information is returned to the Parish Council by the police and the outcome of its use. 8. Any event that requires checking of recorded data should be clearly detailed in the log book of incidents, including Crime Nos. if appropriate, and the Council Office notified at the next available opportunity. 9. Any damage to equipment or malfunction discovered by an operator should be reported immediately to their line manager or contact made with the company responsible for maintenance, and the call logged showing the outcome. When a repair has been made this should also be logged showing the date and time of completion. 10. Any request by an individual member of the public for access to their own recorded image must be made on an 'Access Request Form' and is subject to a standard fee. Forms are available from the Council Office and will be submitted to the next meeting of the Parish Council for consideration and reply, normally within 45 days.

Accountability

Copies of the CCTV Policy are available in accordance with the Freedom of Information Act, as will any reports that are submitted to the Parish Council providing it does not breach security needs. The Police will be informed of the installation and provided with a copy of this CCTV Policy. Any written concerns, complaints or compliments regarding the use of the system will be considered by the Parish Council, in line with the existing complaints policy.

THIS POLICY MUST BE COMPLIED WITH AT ALL TIMES.

I have read the above policy and agree to abide by these instructions. I will discuss any concerns with the Clerk to the Council at any time.

Signed

Print Name

Date/...../.....

(Operators are issued with their own copy of this policy and shall sign to confirm receipt and compliance.)

Disclaimer Please be aware that copies of correspondence received by this Council including letters, emails and memos, may be displayed publicly, on the Councils notice boards, and will be held as part of the agenda pack as information items, which may be discussed at Parish Council Meetings. This information will be held for viewing for a period of four weeks and correspondence received by this Council will be held for a minimum 6 years. If you have any further queries about how we hold and process your correspondence, in the first instance please contact Margaret Murray at the Parish Office on 01252 782893. Please note all telephone calls to the Parish Office are recorded for training and quality purposes.

