



CCTV POLICY

Date Ratified: 11th February 2025

Meeting: Finance and General Purpose Committee

Review date: February 2028 (3 yearly review)

1. Thornbury Town Council CCTV Policy

1.1 Policy Overview

This policy governs the management, operation, use, and confidentiality of CCTV systems at the Town Hall, Mundy Playing Fields, and the Cemetery at Kington Lane. It takes into account the **Information Commissioner's Office (ICO) Code of Practice** and the **Surveillance Camera Code of Practice 2013**, Amended November 2021, following the **Protection of Freedoms Act 2012**.

This policy will be reviewed by the Town Council sooner than 3 years if there are changes to legislative requirements or if it reflects public interest.

Thornbury Town Council adheres to the principles of the **General Data Protection Regulations (GDPR) 2018**, which include that personal data is:

- used fairly, lawfully and transparently
- used for specified, explicit purposes
- used in a way that is adequate, relevant and limited to only what is necessary
- accurate and, where necessary, kept up to date
- kept for no longer than is necessary
- handled in a way that ensures appropriate security, including protection against unlawful or unauthorised processing, access, loss, destruction or damage

1.2. Statement of Purpose

The CCTV system aims to provide a safe and secure environment for those visiting or using Thornbury Town Council facilities at the Town Hall, The Pavilion (Mundy Playing Fields) and the Cemetery.

The system is used to:

- Reduce crime-related fears, allowing visitors to use facilities without intimidation.
- Deter and detect crime, vandalism, and disorder.
- Assist police and law enforcement in identifying offenders by using retrievable evidence.
- Deter potential offenders through visible CCTV cameras and clear signage.
- Assist emergency services in carrying out lawful duties.

1.3. Scheme Responsibilities

The elected Town Council retains overall responsibility for the scheme.

2. CCTV Code of Practice

2.1 Management of the System

Thornbury Town Council operates internal and external CCTV at various locations. The system is not monitored routinely but accessed when needed. Day-to-day responsibility lies with the Chief Executive Officer (Town Clerk), Deputy Clerk, Site Manager, Supervisors, and Grounds Staff.

Breaches of this policy will be investigated by the Chief Executive and reported to the Town Council. The system operates within legal frameworks, focusing on crime prevention through increased risk of detection and prosecution.

Copies of this policy will be provided to all involved and made available in secure recording areas.

2.2. Operation of Cameras, Monitors, and Systems

Authorised operators are Thornbury Town Council Staff only who must act with due probity and not abuse the equipment or change the pre-set criteria to compromise the privacy of an individual.

The position and style of cameras and monitors have been sited to support our **Statement of Purpose**, and the Police have been notified.

In addition:

- a. No public access will be allowed to the monitors except for lawful, proper and sufficient reason, with prior approval of either the Chief Executive Officer, Deputy Town Clerk, Mayor or Deputy Mayor.
- b. 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 sites to review and confirm the Town Council's operation of CCTV arrangements. Any visit by the Police to view images will be logged by the operator.
- c. Operators should regularly check the accuracy of the date/time displayed.
- d. Digital records should be securely stored to comply with data protection and should only be handled by the minimum number of persons. Digital images will be erased after a period of 30 days at both the Mundy Playing Fields and the Cemetery at Kington Lane and are automatically overwritten at the Town Hall when the memory is full.
- e. The CCTV images at the Mundy Playing Fields and the Cemetery are password protected and kept in a locked. The passwords of these systems are not permitted to be shared beyond the roles stipulated in this policy - the Chief Executive Officer, the Deputy Town Clerk, the Outdoor Manager, the Outdoor Supervisors and the Grounds Staff. Sharing a password beyond this group is considered a breach of this policy and could lead to disciplinary action.

- f. 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 Chief Executive Officer will inform the Chair of the Council of any such action.
- g. As records may be required as evidence at Court, each person handling a 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 Town Council by the police and the outcome of its use.
- h. Any event that requires checking of recorded data will be clearly detailed in the logbook of incidents, including crime numbers if appropriate, and the Council Office notified at the next available opportunity.
- i. 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.
- j. Any request by the police for access to CCTV images to identify a specific incident must be made on an 'Access Request Form' with no charge.
- k. [The UK General Data Protection Regulation](#) (UK GDPR) gives individuals the right of access to their personal data from any person or organisation that holds information about them. This right is commonly exercised through a 'subject access request' (SAR). A form is provided in the appendices.

2.3. Accountability

This CCTV policy is available under the **Freedom of Information Act**, except where security is at risk. The police will be informed of installations and provided with a copy of the policy.

Concerns or complaints about CCTV use will be handled in line with the Town Council's complaints procedure.

Thornbury Town Council uses CCTV solely for the prevention and detection of crime and ensuring customer safety. It will not be used for other purposes. The use of CCTV will be reviewed annually.

2.4. Policy Compliance

This policy must be adhered to at all times. Any concerns should be raised with the Chief Executive Officer.