Chandler's Ford Parish Council

CCTV Policy

Introduction

Closed circuit television (CCTV) is installed at the Fryern Pavilion and Hiltingbury Sportshall, with some coverage of the surrounding recreation grounds, and Eagle Close allotments for the security of residents, visitors, premises and all of their users and staff. Images from the cameras are recorded.

The use of CCTV falls within the scope of the General Data Protection Regulation and the Data Protection Act 2018. The lawful basis for processing CCTV footage is the Council's legitimate interests in ensuring the security and safety of residents, visitors, staff and premises.

In order to comply with the requirements of the law, 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

Data Protection Statement

- Chandlers Ford Parish Council is the Data Controller under the Act
- CCTV is installed for the security of residents, visitors, premises and their users and staff
- Access to stored images will be controlled on a restricted basis within the Council and limited to authorised Council personnel and the Police Community Support Officer
- Use of images, including the provision of images to a third party, will be in accordance with any requirements that may be occasioned by the Council's Data Protection registration
- CCTV may be used to monitor the movements and activities of visitors on the covered premises.
- External and internal signage on the premises states CCTV is in operation and indicates a contact number during office hours for enquiries and identifies CFPC as data controller

Retention of Images

Images from the cameras are recorded on a secure hard drive ("the recordings").

Recordings are held for up to thirty days in secure storage and access controlled.

Recordings which are not required for the purposes of security of staff, and premises, will not be retained for longer than is necessary.

Recordings for Eagle Close are held for up to eight days in secure storage and access controlled. Recordings at this site are retained for a shorter period of time due to the lower volume of incidents historically recorded and to minimise unnecessary retention.

The cameras do not have an automatic power backup facility in the event of a main supply power failure. In the event of a power failure, the CCTV system will not operate or record. Any wifi or broadband outage will not affect the system as it will continue to record.

Access to Images

It is important that access to and disclosure of images recorded by CCTV and similar surveillance equipment are restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes.

A maintenance log will be kept recording equipment faults, outages, repairs and any action taken to rectify issues with the CCTV system.

Access to Images by Council Staff

Access to recorded images is restricted to Parish Council staff and the Police Community Support Officer who will decide whether to allow requests for access by data subjects and/or third parties (see below).

Viewing of images must be documented as follows:

- the name of the person accessing the recordings
- the date and time of accessing the recordings
- the name(s) of the person(s) viewing the images (including the names and organisations of any third parties)
- the reason for the viewing
- the outcome, if any, of the viewing
- the date and time of replacement of the recordings

All staff with access to CCTV systems receive training in data protection obligations and appropriate use of recorded images.

Removal/Copying of Images for Use in Legal Proceedings

In cases where recordings are removed/copied from secure storage for use in legal proceedings, the following must be documented:

- the name of the person removing/copying from secure storage, or otherwise accessing, the recordings
- the date and time of removal/copying of the recordings
- the reason for removal/copying
- specific authorisation of removal and provision to a third party
- any crime incident number to which the images may be relevant
- the place to which the recordings will be taken
- the signature of the collecting police officer, where appropriate
- the date and time of replacement into secure storage of the recordings

Access to Images by Third Parties

Requests for access to images will be made using the ‘Application to access to CCTV images’ form (which is at Appendix 1). The Data Controller will assess applications and decide whether the requested access will be permitted. Release will be specifically authorised. Disclosure of recorded images to third parties will only be made in limited and prescribed circumstances. For example, in cases of the prevention and detection of crime, disclosure to third parties will be limited to the following:

- law enforcement agencies where the images recorded would assist in a specific criminal enquiry
- prosecution agencies
- relevant legal representatives
- the press/media, where it is decided that the public's assistance is needed in order to assist in the identification of a victim, witness or perpetrator in relation to a criminal incident; as part of that decision, the wishes of the victim of an incident should be taken into account
- people whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings). All requests for access or for disclosure should be recorded. If access or disclosure is denied, the reason should be documented as above.

Disclosure of Images to the Media

If it is decided that images will be disclosed to the media (other than in the circumstances outlined above), the images of other individuals must be disguised or blurred so that they are not readily identifiable.

If the CCTV system does not have the facilities to carry out that type of editing, an editing company may need to be used to carry it out. If an editing company is used, then the Data Controller must ensure that there is a contractual relationship between it and the editing company, and:

- that the editing company has given appropriate guarantees regarding the security measures it takes in relation to the images
- the written contract makes it explicit that the editing company can only use the images in accordance with the instructions of the Data Controller
- the written contract makes the security guarantees provided by the editing company explicit.

Access by Data Subjects

This is a right of access under the GDPR and the DPA 2018. Requests for access to images will be made using the 'Application for CCTV Data Access' form (which is at Appendix 1). The requesting party needs to provide enough information so that they can be identified in the footage, such as a specific date and time, proof of identity and a description of the requesting party. Any footage provided may be edited to protect the identities of any other people.

Data Subject Rights

In addition to the right of access, individuals have the right to request deletion or restriction of processing, object to processing and lodge complaints with the Information Commissioner's Office.

Procedures for Dealing with an Access Request

All requests for access by Data Subjects will be dealt with by the Clerk/Data Protection Officer. The Data Controller will locate the images requested. The Data Controller will determine whether disclosure to the data subject would entail disclosing images of third parties.

The Data Controller will need to determine whether the images of third parties are held under a duty of confidence. In all circumstances the Council's indemnity insurers will be asked to advise on the desirability of releasing any information.

If third party images are not to be disclosed, the Data Controller will arrange for the third-party images to be disguised or blurred. If the CCTV system does not have the facilities to carry out that type of editing, an editing company may need to be used to carry it out. If an editing company is used, then the data controller must ensure that there is a contractual relationship between them and the editing company, and:

- that the editing company has given appropriate guarantees regarding the security measures it takes in relation to the images
- the written contract makes it explicit that the editing company can only use the images in accordance with the instructions of the Data Controller
- the written contract makes the security guarantees provided by the editing company explicit.

The Data Controller will provide a written response to the data subject within 30 days of receiving the request setting out the Data Controller's decision on the request. A copy of the request and response should be retained.

A Data Protection Impact Assessment has been conducted to assess risks to data subjects's rights and freedoms and is available for inspection upon request.

Complaints

Complaints must be in writing and addressed to the Clerk. Where the complainant is a third party, and the complaint or enquiry relates to someone else, the written consent of the data subject to engage in correspondence is required. All complaints will be acknowledged within seven days, and a written response issued within 21 days.

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Adopted by Full Council – 28 July 2025
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Chandler's Ford Parish Council

Appendix 1

Data Protection Act/General Data Protection Regulation

- Application for CCTV Data Access

Please ensure all sections are fully completed (attach a separate sheet if necessary).

Name and address of Applicant :	
Name and address of 'Data Subject' (ie the person whose image is recorded)	
If the Data Subject is not the person making the application, please obtain a signed consent from the data subject	Data Subject signature ……..
If it is not possible to obtain the signature of the Data Subject, please state your reasons	
Please state your reasons for requesting the image –	
Date when requested image was taken	
Time at which requested image was taken	
Location of the Data Subject at the time the image was taken	
Full description of Data Subject	
Please indicate whether you (the applicant) will be satisfied by viewing the image only	

On receipt of a fully compliant application, a response will be provided as soon as possible or within 30 days.

Council Use Only	**Council Use Only**
Access Granted	
Access Not Granted	Reasons For Not Granting Access :
Data Controllers Name : Date	Signature