

Calvert Green Parish Council – CCTV Policy

1. Introduction

Calvert Green Parish Council (CGPC) owns and maintains the closed-circuit television (CCTV) cameras and recording equipment located at Calvert Green Community Centre, Cotswolds Way, Calvert, Buckinghamshire MK18 2FJ.

The CCTV system was installed by a professional CCTV company in 2019, following the extension of the Community Centre. The system is used for the purposes of:

- Protecting Parish Council property and assets
- Promoting the safety and security of Community Centre users, visitors, staff and contractors
- Assisting in the prevention and detection of crime and anti-social behaviour

The use of CCTV is not intended for routine monitoring of individuals. Monitoring will only occur where there is a specific and documented reason, such as investigating an incident, allegation of misuse, breach of contract, or suspected criminal activity.

2. Data Controller, Processor and Legal Framework

For the purposes of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018:

- **Calvert Green Parish Council is the Data Controller**
- **Calvert Green Community Association (CGCA) is the Data Processor**

CGCA is a registered charity which manages and operates the Community Centre and associated facilities under a lease arrangement with the Parish Council.

A written **Data Processing Agreement** is in place between CGPC and CGCA in accordance with Article 28 of the UK GDPR. This agreement sets out the responsibilities of each party, including confidentiality, security measures, breach reporting, assistance with subject access requests, and arrangements at the end of the lease or processing arrangement.

As Data Controller, CGPC has registered the CCTV system with the Information Commissioner's Office (ICO) and pays the required annual data protection fee.

3. Lawful Basis and Data Protection Principles

The lawful basis for processing CCTV images is **Article 6(1)(e) of the UK GDPR** – processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the Parish Council.

All processing of CCTV data is carried out in accordance with the data protection principles set out in the UK GDPR, namely:

- Lawfulness, fairness and transparency
- Purpose limitation

- Data minimisation
- Accuracy
- Storage limitation
- Integrity and confidentiality (security)
- Accountability

4. Transparency and Signage

Clear and visible signage is displayed at the entrances to the Community Centre and at appropriate locations around the premises. The signage:

- Advises that CCTV is in operation
- States the purpose of the system
- Identifies Calvert Green Parish Council as the Data Controller
- Provides contact details for data protection enquiries

This information is provided to ensure transparency and to support individuals' rights under data protection legislation.

5. Location of Cameras and System Operation

CCTV cameras are positioned at strategic locations inside and outside the Community Centre, including the car park. Camera placement is designed to minimise intrusion into private areas and to focus only on areas relevant to the stated purposes.

Key operational details:

- Cameras are fixed, non-movable, and positioned out of reach
- Cameras cannot be repositioned without physical adjustment
- Any areas of private land or property bordering the site are digitally obscured

Recorded images are retained for approximately **30 days**, after which they are automatically overwritten. Retention periods may vary slightly depending on motion activity and system capacity.

6. Access to the System and Security

Access to the live CCTV system is strictly limited to authorised individuals, namely:

- The Parish Council Clerk
- The Parish Council Chairman
- The Parish Council Data Protection Officer (where appointed)
- A nominated councillor responsible for weekly safety checks

- Authorised CGCA members, as covered by the CGCA CCTV policy.

Access is password protected and restricted to those who require it for authorised purposes. Access rights are reviewed periodically and removed immediately when an individual's role changes or ceases.

Where technically possible, access to the system is logged or auditable.

7. Access to Recordings and Disclosure of Images

Day-to-day access to CCTV recordings and disclosure of images is carried out by CGCA in its capacity as Data Processor and strictly in accordance with the CGCA CCTV Policy document.

Calvert Green Parish Council does not routinely access recordings or disclose images.

Any disclosure of CCTV images must be lawful, proportionate and necessary, for example to law enforcement agencies.

8. Subject Access Requests (SARs)

Individuals have the right to request access to personal data relating to them under the UK GDPR.

All Subject Access Requests relating to CCTV images must be:

- Passed immediately to Calvert Green Parish Council
- Logged and managed by CGPC as Data Controller

CGCA will provide reasonable assistance to locate and retrieve relevant footage. Final decisions regarding disclosure, redaction of third parties, and response times remain the responsibility of CGPC. Responses will be issued within the statutory one-month timeframe.

9. Data Breaches and Incident Management

A data breach may include unauthorised access to CCTV footage, accidental disclosure, loss of recordings, or security compromise of the system.

In the event of a suspected or actual data breach:

- CGCA must notify CGPC without undue delay
- CGPC will assess the risk to individuals' rights and freedoms
- Where required, CGPC will report the breach to the Information Commissioner's Office within 72 hours
- Affected individuals will be notified where legally required

10. Parish Council Responsibilities

The Parish Council is responsible for:

- Funding the maintenance of the CCTV system by a qualified contractor
- Funding replacement of CCTV equipment where required
- Ensuring the system remains fit for purpose and compliant with data protection law

A weekly visual check of camera positioning is carried out using the monitor located in the Community Centre plant room to confirm that:

- Cameras have not been moved
- Private areas remain digitally obscured

Any issues identified will be reported to CGCA for investigation or corrective action.

11. Data Protection Impact Assessment and Review

A Data Protection Impact Assessment (DPIA) has been completed for the CCTV system, recognising that it monitors areas accessible to the public.

This policy, the DPIA, and the CCTV system itself will be reviewed:

- At least every three years, or
- Earlier if there are significant changes to the system, its purpose, or relevant legislation

12. Lease Termination or Change of Management

In the event of lease termination or a material change to management or operational arrangements:

- Access credentials will be reviewed and reset as necessary
- Responsibilities for ongoing processing of CCTV data will be formally confirmed
- Arrangements for the secure retention, transfer, or deletion of recordings will be documented

Any change to controller or processor roles will be reflected in updated documentation and agreements.