

CCTV Policy

For review: July 2025

1. MANAGING THE POLICY

(a) Compliance

This policy applies to all staff, whether permanent or temporary, council members and contractors.

(b) Advice and Training

If you do not understand anything in this policy or feel you need specific training to comply with it, you should bring this to the attention of your manager.

(c) Equality and Diversity

Every policy must consider equality and identify any potential barriers or discrimination faced by people protected by equality legislation.

2. INTRODUCTION

The purpose of this policy is to provide Hamble Parish Council (the “Parish Council”) with guidance in order to comply with relevant legislation relating to the use of Closed Circuit Television (“CCTV”) in Hamble. It will enshrine within the Council’s practices the surveillance camera code of practice and data protection code of practice for surveillance cameras and personal information to ensure the Council meets its statutory obligations, and to ensure that individuals and the wider community have confidence that surveillance cameras are deployed to protect and support them rather than spy on them.

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 with the recording equipment. With advanced technology CCTV is being replaced with VSS, or Video Surveillance Systems. For the purposes of this policy CCTV includes any installed VSS.

This Policy is designed to control the management, operation, use and confidentiality of the CCTV systems at the Roy Underdown Pavilion and playing fields, the Mount Pleasant pavilion and playing fields and the foreshore. A list of camera locations is held by the Parish Clerk.

The definition of CCTV in this policy is “equipment used to capture and store images, potentially including those of persons”.

VSS refers to a more comprehensive and complex system of cameras, sensors, and software that capture, analyse and record video footage in a particular area.

3. PURPOSE AND OBJECTIVES

The purpose of the CCTV installed by the Parish Council is 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 monitor the security of premises or equipment;
- to ensure public safety;
- to reduce the vandalism of property and to prevent, deter and detect crime and disorder;
- to assist the Police and other local enforcement bodies in the identification, detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime or public order;
- to deter potential offenders by publicly displaying the existence of CCTV, having cameras clearly sited that are not hidden and prominent signs on display; and
- to assist all emergency services to carry out their duties.

CCTV will only be installed at publicly accessible premises owned or administered by Hamble Parish Council in the first instance. At a later date, CCTV provision may be extended only following a comprehensive review, the granting of appropriate permissions and an evidential justification. Each installation will need to be justified, normally as a result of logged incidents where CCTV can be judged to be appropriate in order to deter or prevent future incidents.

4. ROLES AND RESPONSIBILITIES

Responsibility for the management of the CCTV and compliance with the ICO will lie with the Parish Council. The following people and organisations are covered by this policy:

- a) Data controller and data owner – meaning Hamble Parish Council
- b) System manager – meaning the Parish Clerk
- c) System user – meaning such councillors, officers, or other individuals from designated bodies authorised to use the surveillance equipment
- d) Data subject – meaning any such individual whose personal information is captured by the surveillance equipment

Any breach of this policy shall be investigated by the Clerk to the Council and reported to the Parish Council.

From 25 May 2018, the Data Protection (Charges and Information) Regulations 2018 requires every organisation or sole trader who processes personal information to pay a data protection fee to the ICO, unless they are exempt.

A VSS system may need to be registered by notifying the Information Commissioner at <https://ico.org.uk/for-organisations/data-protection-fee/> or telephone 0303 123 1113. The notification period is for one year which should be renewed annually.

5. Legislative Requirements

The Parish Council shall comply fully with the requirements of relevant legislation and guidance in the consideration and possible use of CCTV.

<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>
<https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/>

The Parish Council accepts the principles of that data must be:

- fairly and lawfully processed;
- processed for limited purposes and not in any manner incompatible with these purposes;
- adequate, relevant and not excessive;
- accurate;
- not kept for longer than is necessary;
- processed in accordance with individuals' rights; and
- held securely;

The Parish Council shall comply fully with General Data Protection Regulation (GDPR) and the Data Protection Act 2018 (DPA18) in respect of use of any VSS system. The Act applies to all types of VSS systems and is enforceable where a VSS system obtains, records, or stores personal data in the form of video images

- From 25 May 2018, the Data Protection (Charges and Information) Regulations 2018 requires every organisation or sole trader who processes personal information to pay a data protection fee to the ICO, unless they are exempt. The power for a parish council to install CCTV and other surveillance equipment is conferred under Local Government and Rating Act 1997 s.31:

(1) A parish council or community council may, for the detection or prevention of crime in their area –

- (a) install and maintain any equipment,
- (b) establish and maintain any scheme, or
- (c) assist others to install and maintain any equipment or to establish and maintain any scheme.

The Council also has a duty to consider crime and disorder implications of their functions, under the Crime and Disorder Act 1998 s.17:

(1) It shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonable can to prevent:

- (a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and
- (b) the misuse of drugs, alcohol and other substances in its area; and
- (c) re-offending in its area

The Parish Council shall comply will all legislation, and resultant codes, apply to gathering and use of data.

The Parish Council recognises that images captured by CCTV may have to be released following a request made under the Freedom of Information Act 2000 (“FOIA”) and receipt of a completed subject access request form.

6. SURVEILLANCE CAMERA CODE OF PRACTICE

The Surveillance Camera Code of Practice was issued in 2013 following the introduction of the Protection of Freedoms Act 2012 and further updated in 2014. The Code provides guidance on the appropriate and effective use of surveillance camera systems.

The code provides 12 guiding principles which the council has adopted. These are:

- 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.
- The use of a surveillance camera system must consider its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
- 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.
- There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held, and used.
- 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.
- 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 purposes have been discharged.

- 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.
- 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.
- Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
- 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.
- When the use of a surveillance camera system is in pursuit of a legitimate aim and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
- Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date.

7. ACCESS

The CCTV installation company are appointed to carry out regular checks of the CCTV and can access the system to carry out essential maintenance repairs when requested by the Clerk and/or the Police.

Only those appointed by the Parish Council may access the cameras, monitors and associated systems, the following points must be understood and strictly observed by those persons:

- they 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 of cameras and monitors have been agreed following consultation with the Police and other relevant bodies;
- no public access will be allowed to the monitor except with the express approval of the Clerk and with a written and justified reason;
- the Police and other enforcement bodies will be permitted access to recording media if they have reason to believe that such access is necessary to investigate, detect or prevent crime. Any visit by an enforcement body to view images or retrieve evidence will be logged;

- the accuracy of the date/time displayed will be checked on each occasion that the system is accessed;
- digital records and images shall be securely stored to comply with data protection and should only be handled by specifically designated persons. Records and images will normally be erased after a certain period, but may be retained for longer because of a known incident and required for the apprehension or prosecution of offenders;
- digital records or images shall not be supplied to the media, except on the advice of the Police. Such a decision will be taken by the Parish Council;
- as records may be required as evidence in a court of law, each person handling a digital record may be required to make a statement to a Police Officer and sign an exhibit label. Any extracted data that is 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 and/or the outcome of its use;
- any event that requires checking of recorded data should be clearly detailed in the log book of incidents, including crime numbers if appropriate;
- any damage to equipment or malfunction discovered should be reported immediately to the Parish Clerk who will contact the CCTV Contractor 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;
- 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. If there is any doubt concerning the legitimacy of any request then the Clerk will seek advice from the Information Commissioners Office and/or the Surveillance Camera Commissioner.

8. ACCOUNTABILITY

Copies of this policy are available in accordance with the Freedom of Information Act, as will any reports that are submitted to the Parish Council, providing that does not breach security needs.

The Police and other local enforcement bodies will be provided with a copy of this policy.

Any written concerns or complaints regarding the Parish Council's use of the system will be considered under the Parish Council's existing complaints policy.

The CCTV system installed and used by the Parish Council does not require it to be registered with the Information Commissioner due to its static nature. The Parish

Council is registered with the Information Commissioner as a data handler for the processing of the data collected.

One or more signs (black and yellow) shall be displayed in the vicinity of where the CCTV is deployed. One or more laminated notices shall be erected providing the following information:

- purpose of CCTV
- who manages the CCTV;
- contact details for the organisation(s) responsible should anyone want to find out more about the scheme or request access to their CCTV images.

9. REVIEW

This policy, together with the continued need for CCTV usage, will be reviewed by the Parish Council on an annual basis.

Last reviewed by Assets Committee 07/07/2025

APPENDIX A Hamble Parish Council: CCTV Systems in place July 2025

Roy Underdown Pavilion and playing fields

There are 3 CCTV cameras in place.

Equipment is in the grounds team office in RUP pavilion

The equipment is satisfactory but would benefit from updating.

Mount Pleasant Pavilion and playing fields

There is one cameras in place.

The equipment is based in MP Pavilion

The equipment is outdated and not fit for purpose. Quotes are being obtained

Hamble Foreshore

There is one camera in place.

The equipment is based in **Hamble Lifeboat station??**

The equipment is outdated and not fit for purpose. The situation is being reviewed in the light of recent Anto Social behaviours with the assistance of the Police.

Quotes are being obtained and a grant being applied for.

APPENDIX B Hamble Parish Council: CCTV System Annual Review

This CCTV system and images produced by it are controlled by Hamble Parish Council who are responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

Hamble Parish Council has considered the need for using CCTV and has decided it is required for the prevention and detection of crime and for protecting the safety of the public. It will not be used for other purposes.

The Parish Council will conduct an annual review of the use of CCTV in Hamble.	Checked (Date) By	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.		
There is a named individual who is responsible for the operation of the system.		
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.		
Cameras have been sited so that they provide clear images.		
Cameras have been positioned to avoid capturing the images of persons not visiting specific premises or locations.		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.		
An incident log is kept and all access to the system is reported including the date, time, reason, by whom and the outcome		
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.		
Except for law enforcement bodies, images will not be provided to third parties		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.		
The Council has reviewed the use of the system, its management, policies and procedures and its overall appropriateness for continued use		

APPENDIX C: Signage for CCTV used.



APPENDIX D: SUBJECT ACCESS REQUEST FORM

Subject Access Request Form – Hamble Parish Council CCTV

This form is intended to support individuals requesting access to images of themselves captured by CCTV cameras on the Hamble Parish Council CCTV network. Please note: CCTV footage from Hamble Parish Council is normally retained for a maximum of 28 days

To enable us to respond to your request promptly, please ensure that you provide us with:

- The relevant date, location and approximate time
- A description of what is happening in the footage
- A detailed description of what you were wearing/carrying at the time;
- A recent full-length colour photograph of you

The completed form should be sent to the Clerk at Hamble Parish Council using the details provided at the end of the form. If you need further assistance, please e-mail: clerk@hambleparishcouncil.gov.uk. You are not required to complete this form however it may help you set out your request.

1. Your details

Name:	
Address:	
Postcode:	
Telephone number:	
Email address:	

2. Are you the Data Subject (the individual whose personal data is being requested)?

Yes:	Please provide proof of your identity, for example a photocopy of a valid passport or photocard driving licence; We may also request proof of address, if required.. Please go straight to section 5 of this form
No:	Are you acting on behalf of the Data Subject with their explicit consent, or with the appropriate legal authority? If so, this must be evidenced in writing and enclosed with this form. You must also enclose proof of the Data Subject's identity and address as described above. Please ensure that you complete sections 3 and 4 of this form

3. Details of the Data Subject *(If different to those provided in section 1)*

Name:	
Address:	
Postcode:	
Telephone number:	
Email address:	

4. Legal status in relation to the Data Subject *(If you are not the data subject please briefly describe your relationship with them (eg legal adviser, spouse, parent, carer, etc) and explain why you are making this subject access request on their behalf)*

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5. Personal information required *(Please describe as precisely as possible the nature of the images you are requesting; providing details of the exact date and location involved, together with an approximate time. Please also describe your appearance and what you were doing at the time you believe your image was captured. Please continue on a separate sheet if necessary)*

6. Submitting your request

Please email your completed copy marked 'Private and Confidential' to clerk@hambleparishcouncil.gov.uk

Or send the completed copy of this form in a securely sealed envelope marked 'Private and Confidential' to the following address:

Hamble Parish Council
Memorial Hall,
2 High St,
Hamble-le-Rice,
Southampton SO31 4JE

Remember to include:

- Proof of your identity (or, if you are not the Data Subject: proof of the Data Subject's identity and address; and any relevant documents which give you the legal authority to make this request)
- A recent full-length colour photograph of
- A recent full-length colour photograph of you

I understand that it may be necessary for me to provide additional information in order for Hamble Parish Council to confirm my identity (or that of the Data Subject) and/or locate relevant personal information. The statutory response period of one month specified in data protection legislation will not commence until Hamble Parish Council is satisfied in this regard and has received any additional information it has requested in order to process this request.

..... (signature) date of signature

