



# CCTV POLICY

Drayton Parish Council

Policy Holder: Finance & General Purposes Committee

Version 1.0

<b>Approval Date:</b>	11 <sup>th</sup> June 2026	<b>Approval Route:</b>	Council
<b>Next Review Date:</b>	+4 Years	<b>Document Holder:</b>	Finance & General Purposes Committee

## Document Change History

This is version 1.0 of the CCTV Policy and it is the responsibility of the Parish Clerk to ensure that new versions are communicated to Council and made available per the adopted Publication Scheme.

It is the responsibility of the reader to familiarise themselves with this version of the document.

This document is subject to revision and is maintained electronically. Electronic copies are version controlled and printed copies are not subject to this control.

## Summary of Changes

Version 1.0 June 2026	
Ref.	Change
N/A	N/A

## Purpose

The purpose of this policy is to ensure that the Parish Council's use of Closed-Circuit Television (CCTV) systems is conducted in a lawful, transparent and proportionate manner. CCTV is deployed to support the prevention and detection of crime, enhance public safety and protect Council-owned property and assets.

This policy is informed by and complies with the following legislation and guidance:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- Guidance issued by the Information Commissioner's Office (ICO), including CCTV and video surveillance guidance.
- The principles of the Surveillance Camera Code of Practice issued under the Protection of Freedoms Act 2012.

## Principles

The Council will operate its CCTV systems in accordance with the following principles:

- **Lawfulness, fairness and transparency:** CCTV will be operated in compliance with the UK GDPR and Data Protection Act 2018
- **Purpose Limitation:** CCTV will only be used for the specific purposes stated in this policy and supporting documents.
- **Data minimisation:** Cameras will be positioned to capture only areas necessary for the stated purposes.
- **Accuracy:** Systems will be maintained to ensure recorded images are clear and usable.
- **Storage Limitation:** Footage will not be retained for longer than necessary.
- **Integrity and confidentiality:** Appropriate security measures will be in place to protect footage.
- **Accountability:** The Council will maintain appropriate documentation and oversight of CCTV operations.

## Scope

This policy applies to all CCTV systems operated by the Parish Council at the following locations:

- Green Lanes
- King George V Playing Field
- Longdale Playing Field

## Responsibilities

The Council is responsible for:

- ✓ Approval of this policy and supporting procedures.

The *Policy Holder* is responsible for:

- ✓ The review of this policy and supporting procedures and recommendations to Council for amendment.
- ✓ Monitoring and maintaining overall compliance with this policy

The *Parish Clerk* is responsible for:

- ✓ Advising the Policy Holder on the resources and arrangements necessary to fulfil the Council's responsibilities under this policy.
- ✓ Producing reports and recommendations as required to support policy monitoring, review and approval processes.
- ✓ Updating this policy and supporting documentation as required.
- ✓ Day to day management of the CCTV system
- ✓ Handling Subject Access Requests (SARs)
- ✓ Managing data sharing with third parties

The *Councillors* are responsible for:

- ✓ Familiarising themselves with this policy and supporting documentation.

## **Further Information and Supporting Documents**

### Policy Monitoring, Review and Approval

To ensure the Council continues to meet the principles laid out in this policy, the Policy Holder will:

1. Review this policy and supporting documentation every 4 years and in response to relevant changes to legislation and/or government guidance.
2. Review this Policy and supporting documentation as a result of any other relevant significant change or event.
3. Adopt a structured approach to the management of CCTV in the Parish to ensure that essential records of the Council's activities are maintained in appropriate detail.
4. Produce an annual report to Council, assessing and evaluating compliance with procedure and make recommendations as appropriate.

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## CCTV MANAGEMENT PROCEDURE

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### Introduction

In line with the principles set out in the CCTV Policy, the procedure sets out the Council's approach to CCTV Management.

#### **1. Data Protection Impact Assessment (DPIA)**

- 1.1. A DPIA will be completed for the installation of any new CCTV system or when significant changes are made to existing systems.
- 1.2. The DPIA will assess necessity, proportionality and risks to individuals' rights and freedoms and identify measures to mitigate those risks.

#### **2. CCTV Operation**

- 2.1. Cameras operate continuously.
- 2.2. Cameras are positioned to monitor public areas only, ensuring minimal intrusion into individuals' privacy.

#### **3. Signage**

- 3.1. Clear signage is displayed at all sites where CCTV/License Plate Recognition (LPR) is in operation.
- 3.2. Signage includes as a minimum:
  - 3.2.1. Surveillance camera silhouette to indicate CCTV in operation
  - 3.2.2. The Council's name
  - 3.2.3. The Council's contact details.

The Council's website will be listed for contact details to increase the longevity of CCTV signage, where phone numbers and/or email addresses are more likely to change.

#### **4. Data Retention and Disposal**

- 4.1. **Retention:** CCTV footage is typically retained for a maximum of 30 days or up to 512GB storage (approx. 160 hours of footage), after which it will be automatically overwritten. Footage may be retained for longer retention periods where required for ongoing investigations or legal action.
- 4.2. **Disposal:** Automatic overwriting or deletion is in place. Retained footage that is no longer needed for its intended purposes is securely deleted to prevent unauthorised access or retention of personal data.

#### **5. Access to and disclosure of Footage**

- 5.1. Access is restricted to the following authorised personnel only:
  - 5.1.1. TPI Security (Administrator)
  - 5.1.2. Parish Clerk
  - 5.1.3. Deputy Clerk & Facilities Manager
  - 5.1.4. Parish Ranger
- 5.2. Footage may be downloaded and shared with law enforcement where lawful and necessary.
- 5.3. A log is maintained of all access, usage and disclosure of footage including:
  - 5.3.1. Date the footage was accessed

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### **CCTV MANAGEMENT PROCEDURE**

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- 5.3.2. Reason
- 5.3.3. Recipient of any disclosures including their contact information
- 5.3.4. The outcome of any investigation including crime number, if any

#### **6. Security Measures**

- 6.1. Systems are password protected and limited to authorised personnel only.
- 6.2. Data is stored securely to prevent unauthorised access.
- 6.3. **Green Lane:** Camera and SD card are encrypted and password protected and held by the administrator.

#### **7. Maintenance**

- 7.1. CCTV is monitored weekly to ensure cameras remain in good working order, are free from obstruction and display the correct date and time.
- 7.2. Faults are reported to the administrator as soon as identified and addressed promptly.
- 7.3. Faults are recorded in the log including:
  - 7.3.1. The nature of the fault
  - 7.3.2. Date and time fault discovered
  - 7.3.3. Date and time of repair
- 7.4. **Green Lane:** Solar panels are cleaned annually to retain effectiveness.

#### **8. Data Breaches**

- 8.1. Any breach involving CCTV data is reported to the Parish Clerk immediately.
- 8.2. Breaches will be assessed by the Parish Clerk and reported to the ICO where required.
- 8.3. Breaches will be recorded in line with the Council's Data Protection Policy.

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## DATA PROTECTION IMPACT ASSESSMENT

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This Data Protection Impact Assessment (DPIA) follows the template provided by the Information Commissioner's Office (ICO). It has been prepared to identify and assess any data protection risks arising from the use of CCTV systems and ensure compliance with the UK Data Protection Act 2018 and the General Data Protection Regulation (GDPR).

<b>Name of Data Controller</b>	Drayton Parish Council
<b>Name of Data Protection Officer</b>	N/A
<b>Name of Data Contact</b>	Parish Clerk

### Step 1: Identify the need for a DPIA

Drayton Parish Council is responsible for the following 3 public sites which operate CCTV to deter and detect crime, promote public safety, protect council property and assist in the investigation of incidents:

- Green Lanes
- King George V Playing Field
- Longdale Playing Field

The DPIA has been completed to identify and assess any data protection risks arising from the use of CCTV systems installed across these sites and ensure appropriate mitigation.

### Step 2: Describe the processing

#### Nature of processing

CCTV cameras capture video footage of individuals in defined public areas. Footage is recorded, stored securely, and automatically deleted after a set retention period unless required for investigation. Footage may be shared with law enforcement where necessary and lawful.

Where footage is downloaded for evidential or investigative purposes, it is stored securely in Microsoft 365 in a restricted-access folder.

#### Scope of processing

##### Data captured

For all sites, the data captured consists of video images of individuals and vehicles in public areas and Council premises and affects members of the public using these facilities who enter the coverage area. Cameras are positioned to monitor public areas only, ensuring minimal intrusion into individuals' privacy. No special category data is intentionally collected.

- **Longdale Playing Field:**

- In addition, this system includes License Plate Recognition (LPR) technology, whereby vehicle registration numbers are automatically captured and stored separately from video footage.
- The system may also capture images of children using the playground areas. While this does not constitute special category data, children are considered a vulnerable group under data protection law. The Council has taken this into account by limiting camera coverage to necessary areas, ensuring clear signage, and applying strict controls over access and retention of footage. While footage

may include images of children, access to such footage does not constitute regulated activity and does not require DBS checks.

#### Frequency

- **Green Lanes:** Motion activated.
- **King George V Playing Field:** Continuous.
- **Longdale Playing Field:** Continuous.

#### Coverage

- **Green Lanes:** Entrance to footpath, entirety of car park, section of Low Road.
- **King George V Playing Field:** Front and rear entrances to pavilion.
- **Longdale Playing Field:** Front and back entrances to pavilion, entirety of car park, 3G pitch and play area.

#### Retention periods:

- **Green Lanes:** Recording is motion activated and a maximum of 512GB of data is retained before automatic deletion.
- **King George V Playing Field:** Footage is retained for 30 days before automatic deletion.
- **Longdale Playing Field:** Footage is retained for 30 days before automatic deletion.

Where footage is downloaded in relation to an incident, it is retained as long as necessary to resolve the matter, respond to legal claims or fulfil legal obligations.

#### **Context of processing**

The processing takes place in public environments where individuals may reasonably expect some level of surveillance for safety purposes and signage ensures transparency.

The Council is not currently signed up to an approved code of conduct or certification scheme under Article 40 of the UK GDPR, as no relevant approved codes currently apply to parish council CCTV operations. However, the Council adheres to guidance issued by the Information Commissioner's Office (ICO) on CCTV and video surveillance, and has regard to the principles set out in the Surveillance Camera Code of Practice.

#### **Purposes of processing**

The purpose of processing is to:

- Deter and detect anti-social behaviour, vandalism and criminal activity on Council owned premises, including pavilions, car parks and recreation grounds.
- Promote public safety and provide reassurance to members of the community, staff, volunteers and visitors using these facilities.
- Protect Council property and assets from damage, theft or misuse, including security of the site to ensure gates are secured to prevent unauthorised access.
- Support local crime prevention measures and assist law enforcement agencies, where appropriate, by providing evidence in connection with criminal investigations or legal proceedings.
- Reduce the risk of liability or false insurance claims.

The intended benefit is enhanced safety and reduced incidents at parish sites.

**Step 3: Consultation process**

Formal consultation with the public is not considered necessary at this stage. CCTV use in these settings is standard practice and generally expected by those using the facilities.

Public awareness and transparency are ensured through signage and published policy documents and individuals may raise concerns using Council contact details.

Internal consultation includes:

- Data Contact
- Deputy Clerk & Facilities Manager responsible for overseeing building and asset security
- Staff authorised to access and manage CCTV systems
- CCTV Policy Holder

The CCTV Policy, procedure and DPIA are subject to review and approval by Council.

Where necessary, Council may seek external expertise particularly where:

- Systems expand significantly
- New technologies are introduced such as facial recognition
- Public concerns or complaints are raised

**Step 4: Assess necessity and proportionality**

The use of CCTV is considered necessary to achieve the Council’s aims identified in Step 2, particularly in unattended areas such as car parks and pavilions.

While alternative measures including lighting, signage, locks and inspections are in place these methods alone are not considered to offer the same level of deterrence, evidential value or coverage, especially outside staffed hours. CCTV is therefore considered as a complementary solution.

LPR functionality is used to support the identification of vehicles involved in incidents in car park areas, where visual footage alone may be insufficient.

In circumstances where there are concerns regarding whether gates or access points have been secured, limited review of CCTV footage may be necessary to verify site security. This is considered proportionate as it is undertaken only in response to specific issues and is not used for routine monitoring of individuals.

The system is proportionate because coverage is limited to key risk areas, camera positioning avoids private property and footage is retained only for a defined period.

Data minimisation is achieved through restricted coverage. Individuals are informed via signage and can exercise their rights through established procedures. There are no international data transfers.

The lawful basis for processing under the UK GDPR is:

- Article 6(1)(e) – Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority.

**Step 5: Identify and assess risks**

Risk	Likelihood	Severity	Overall Risk
Unauthorised access to CCTV or LPR data	Possible	Significant	Medium
Individuals unaware of recording	Possible	Minimal	Low

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**DATA PROTECTION IMPACT ASSESSMENT**

Camera Overreach – capturing unintended areas	Remote	Significant	Low
Function creep – use of CCTV/LPR for purposes beyond original intent	Possible	Significant	Medium
Misuse or inappropriate searching of LPR data	Possible	Significant	Medium
Increased identifiability of individuals through linkage of vehicle registration data	Possible	Significant	Medium

**Step 6: Identify Measures to Reduce Risk**

Risk	Control Measures
Unauthorised access	Password protection, restricted access by authorised personnel only, access logs maintained, encrypted data.
Lack of awareness	Clear signage.
Over-collection of data	Careful camera positioning, periodic review.
Function creep	Policy restriction on use, incident-based access only.
Misuse of searchable vehicle data	Limited access and strict purpose use. The Council does not track or profile vehicles.
Increased identifiability	The system is not linked to any central database.

**Step 7: Sign off**

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