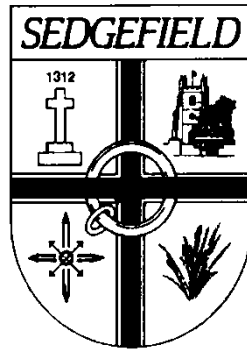


Sedgefield Town Council



SEDFIELD PARISH HALL CLOSED CIRCUIT TELEVISION CAMERAS (CCTV) POLICY

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1.0	13.03.23	Jane Ayre, Town Clerk	February 2025

SEDGEFIELD PARISH HALL CCTV POLICY

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This CCTV Policy was adopted by the Town Council's Policy & Resources Committee on 13th March 2023 and will be reviewed on an on-going basis by the Council's Estates Working Group and re-presented to the P&R Committee annually.

1. Introduction:

Sedgefield Parish Hall is owned and operated by Sedgefield Town Council. It is a community building with multiple rooms for hire, available seven days per week (excluding bank holidays) from 8am until midnight, with an array of facilities and is hired by private individuals as well as community and/or commercial groups. The building is not staffed for the duration of its operating hours. Closed circuit television (CCTV) is installed in the building. Four cameras are located within the building and one camera outside the building, i.e. the CCTV system comprises of five cameras in total, with images being recorded digitally and then automatically recorded over after 21 days.

This document details the policy and procedures used to control the management, operation, use and confidentiality of the CCTV system.

2. Purpose and Objectives Of CCTV System:

The purpose and objectives of the CCTV system are:

- To maintain the security of the premises
- To deter, detect and prevent crime, vandalism and anti-social behaviour
- To provide a safe and secure environment for staff, hirers, visitors and contractors
- To assist Law Enforcement Agencies to carry out their lawful duties

3. Warning Signage:

CCTV warning signs (see Appendix A) are clearly and prominently displayed at the following locations so that people entering the Parish Hall are aware they are entering a building covered by CCTV:

- 1 sign in the glass of the entry doors from the car park facing outwards
- 1 sign to the left hand side of the entry doors from the car park facing inwards

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- 1 sign next to the alarm box at the entrance to the Parish Hall from Front Street
- 1 sign on Fletcher Room door (between main room and corridor to fire exit)
- 1 sign outside small meeting room leading to landing/corridor leading to stage stairs

In addition to the warning signage, a Sedgefield Town Council Parish Hall CCTV Notice is also displayed (see Appendix B).

4. **Siting the Cameras and Coverage:**

Cameras have been sited carefully so that they only capture images relevant to the purposes for which they are installed (described in Section 2) and care has been taken to ensure that reasonable privacy expectations are not violated. Every effort has been made by Sedgefield Town Council to position cameras so that their coverage is restricted to the Parish Hall premises which may include public areas. It is not possible to guarantee that the system will cover or detect every single incident taking place in the Parish Hall.

The cameras are sited as follows:

- 1 x the lobby area with coverage showing the main kitchen hatch and staircase door to the small meeting room;
- 1 x the bar area with coverage showing the outer door to the gents toilets and view to side entrance doors (main doors to accessing the building);
- 1 x the main hall floor area only with coverage from the entrance steps down to the floor and entire wooden ground floor area plus some of side area where seats are stacked;
- 1 x the Fletcher Room with coverage showing kitchen hatch, entire room and door to fire exit;
- 1 x above front side entrance with coverage showing entrance steps and approximately 40% of car park area.

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5. Recording and Retention of CCTV Images:

The Hall's CCTV system continuously records images only, i.e. there is no audio recording and the system operates 24/7.

Recorded data is stored automatically for up to 21 days on a stand-alone hard drive which is located, along with a monitor, in the locked small store room at the rear of the Fletcher Room. The CCTV system clearly shows the date and time which means that recorded data will be stored in a way that ensures the security and integrity of the image along with specific times and dates are identified. This is operated on a stand alone PC located in the locked storeroom at the rear of the Fletcher Room. It is located in a secure cabinet which only authorised staff have access to.

Normally, recorded data will not be retained for longer than 21 days. On occasion, images may need to be retained longer where, for example, an incident has been identified or a Subject Access Request has been made or time is required to enable the Law Enforcement Agencies to collect relevant images or the Law Enforcement Agencies are investigating a crime and ask for images to be preserved to afford them the opportunity to view the information as part of an active crime investigation. Images will not be stored on, or transferred to, removable media such as CDs or flash drives unless required as evidence by the Police or other Law Enforcement Agency.

The images produced by the CCTV system are intended to be as clear as possible so that they are effective for the purposes as detailed in Section 2. Maintenance checks of the equipment are undertaken monthly to ensure the system is working properly and the high quality images are being produced (see CCTV System Log Book located in secure cabinet). Any damage to equipment or malfunction discovered should be reported immediately to the Town Clerk (and in their absence the Chairman of the Council) and recorded. An immediate request for repair should be actioned and when the repair has been completed, this should also be logged showing the date and time of completion (see CCTV System Log Book located in secure cabinet).

Other than for routine testing purposes, real time CCTV images will not be monitored unless it is thought that an incident is happening at that time and recorded CCTV images will normally be accessed by authorised personnel only in the event of a qualifying incident or during routine system testing.

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Once the CCTV system's hard drive has reached the end of its use, it will be erased prior to disposal.

6. Access to CCTV Images and Disclosure:

Access to the CCTV system's recordings is restricted to the Town Clerk, Receptionist & Parish Hall Support Officer and Projects & Media Co-ordinator. Disclosure of information will be controlled (see CCTV System Log Book located in secure cabinet) and consistent with the purpose and objective(s) for which the CCTV system has been established. Once information is disclosed to a Law Enforcement Agency, they will become Data Controller for the copy which they hold.

The following guidelines will be adhered to in relation to the disclosure of images:

- a) The disclosure of images will be in line with the system's purpose and objective(s) and will be controlled under the supervision of the Town Clerk (and in their absence of the Chairman of the Town Council);
- b) A log will be maintained itemising the date, time(s), camera, person copying, person receiving and reason for the disclosure (see Appendix E);
- c) The appropriate disclosure documentation from the Law Enforcement Agencies will be filed for future reference;
- d) Images must not be forwarded to the media for entertainment purposes or be placed on the internet;
- e) Images must not be copied in any way, e.g. photographed, downloaded or printed for use other than described in the CCTV system's purpose and objectives;
- f) Images will only be released to the media for identification purposes in liaison with the Law Enforcement Agencies;
- g) The method of disclosing images should be secure to ensure that they are only seen by the intended recipient; and
- h) Images of third parties not relevant to the investigation should be obscured where possible to prevent unnecessary identification.

The operation of the CCTV system is limited to the Town Clerk, Receptionist & Parish Hall Support Officer and Projects & Media Co-ordinator. These

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Officers can be described as “Operators”. The following points must be understood and strictly observed by Operators:

- a) Operators must act with integrity and not abuse the equipment or change the pre-set criteria to compromise the privacy of an individual.
- b) No public access will be allowed to the CCTV system monitor except for lawful, proper and sufficient reason, with prior approval of the Town Clerk (and in their absence the Chairman of the Council). The Police are permitted access to the CCTV system if they have reason to believe that such access is necessary to investigate, detect or prevent crime. The Police are permitted to visit Sedgefield Parish Hall to review and confirm the Council’s operation of CCTV by arrangement. Any visit by the Police to view images will be logged by the Town Clerk or Chairman of the Council.

7. Subject Access Requests:

Under the Data Protection Act 1998 and General Data Protection Regulations (GDPR) individuals have the right on request to receive a copy of the personal data the Town Council holds about them, including CCTV images if they are recognisable from the image.

If anyone wishes to access any CCTV images relating to themselves, they must make a written request, either letter or email, to the Town Clerk and the Town Council reserves the right to charge a fee of £25 for the supply of the images requested. The request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and identity can be established as the person in the images. The Town Council will respond to requests within 21 days of receiving the written request. The Town Clerk (and in their absence the Chairman of the Council) will check the identity of the person making the request before processing it. The Town Clerk will first determine whether disclosure of requested images will reveal third party information, as no one has a right to access CCTV images relating to other people. In such a case, the image of any third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy. If the Town Council is unable to comply with an individual’s request because access could prejudice the prevention or detection of crime or the

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apprehension or prosecution of offenders, the individual will be advised accordingly.

8. Covert Recording:

Sedgefield Town Council does not undertake covert recording.

9. Further Information:

For further enquiries regarding the operation of the Town Council's CCTV system in the Parish Hall please contact the Town Clerk via town.clerk@sedgefieldtowncouncil.gov.uk. Appendix C presents the Town Council's Data Protection Impact Assessment (DPIA).

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APPENDIX A - CCTV Warning Sign

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APPENDIX B - Sedgefield Town Council Parish Hall CCTV Notice

Version:	Adopted:	Officer Responsible:	Review Date:
1.0	13.03.23	Jane Ayre, Town Clerk	February 2025

Sedgefield Town Council Sedgefield Parish Hall CCTV Notice

Sedgefield Parish Hall has been a CCTV system in operation for the purpose of safety and security. The cameras have been installed in order to provide a safe and secure environment for staff, hirers, visitors and contractors as well as prevent loss or damage to the Hall.

Sedgefield Town Council complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that it is used responsibly. This Code of practice is published on the ICO website.

The CCTV system comprises of 5 cameras with digitally record areas in the lobby area, bar area, Fletcher Room and main hall as well as above the front entrance (entrance from car park area). CCTV images are automatically recorded on a secure, password protected control unit and shall be automatically deleted after a period of 21 days unless there is a valid reason to securely hold these images for longer whilst any investigations take place. CCTV images are only sited so they capture images relevant to the purposes for which they are intended. Other than for routine testing purposes, real time CCTV images will not be monitored unless it is thought that an incident is happening at that time and recorded CCTV images will normally be accessed by authorised personnel only in the event of a qualifying incident or during routine system testing. Access to any recordings is limited to the Town Council, the Police, our Insurance Company loss adjustors (if required) and other parties for the purposes of our security and safety only. At all times precautions will be taken to protect the rights of people whose images have been recorded. Please note that the system does not have any sound recording capability. Individuals may apply for CCTV footage to be reviewed when a crime or incident has occurred and there is a reasonable likelihood that the event or incident was captured by the CCTV system. Any requests to access images must be made in writing, either letter or email, to the Town Council via the Town Clerk. Any requests will be reviewed in line with the CCTV Policy and full reasons will be provided if any request is declined.

Version:	Adopted:	Officer Responsible:	Review Date:
1.0	13.03.23	Jane Ayre, Town Clerk	February 2025

APPENDIX C - Sedgefield Town Council Parish Hall Data Protection Impact Assessment (DPIA)

Version:	Adopted:	Officer Responsible:	Review Date:
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Sedgefield Parish Hall

Data Protection Impact Assessment (DPIA)

This document explains how Sedgefield Town Council record their DPIA process and outcomes. It follows the process set out in the Information Commissioner DPIA guidance and European guidelines on DPIAs.

Submitting controller details

Name of controller	Dr Jane Ayre
Subject/title of DPO	Town Clerk

Step 1: Identify the need for a DPIA

Sedgefield Town Council have installed a CCTV system at Sedgefield Parish Hall to deter crime, theft and anti-social behaviour and to record such incidences and able law enforcement agencies to take legal action as necessary.

The DPIA is required due to CCTV monitoring all Parish Hall users. In addition, the Town Council has produced a CCTV Policy for the Parish Hall and Section 2 details the Purpose and Objectives of the CCTV System and Section 3 details the warning signage displayed in the Parish Hall.

Step 2: Describe the processing

The CCTV system within the Parish Hall comprises of 5 cameras (see Section 4 of the CCTV Policy for details of camera sitings and coverage). The system digitally records (image only, i.e. no audio) on a continuous 24/7 basis with recordings being saved for a period of 21 days before being recorded over. Section 5 of the CCTV Policy details how recordings are made and retained, Section 5 of the Policy access and disclosure arrangements then Section 7 the subject access requests. As detailed in Section 8 of the CCTV Policy there are no covert recordings permitted in Sedgefield Parish Hall.

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Describe the context of the processing:

Sedgefield Parish Hall's relationship to those using the Parish Hall and its facilities, is as the owner of the building.

Members of the public have no control over the use of the CCTV and can only submit a Subject Access Request for data/footage/images from the system for a reasonable reason, which the Town Council deems necessary, due to the Data Protection Act and GDPR.

As owner's of the Parish Hall, the Town Council felt it prudent to install a CCTV system to ensure the safety and security of all its users and its assets.

Sedgefield Town Council will not share the data with anyone outside of its remit or unauthorized individuals. Only authorized users of the system itself, the Police or other relevant authorities and only if absolutely necessary, where there is a reasonable request to do so, will be eligible to view or share data. Sections 5, 6 and 7 of the CCTV Policy provide more information regarding the context of processing from the CCTV system in Sedgefield Parish Hall.

Describe the purposes of the processing:

Sedgefield Town Council want to ensure the safety and security of all users of Sedgefield Parish Hall and its assets. Section 2 of the CCTV Policy details the Purpose and Objectives of the CCTV System and Section 3 details the warning signage displayed in the Parish Hall. A CCTV notice (see Appendix B) is also displayed on the Town Council's information board in the Parish Hall.

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Step 3: Consultation process

Consider how to consult with relevant stakeholders:

The CCTV system was installed in Sedgefield Parish Hall in 2008 by Steadfast. An additional camera was added, and repair work undertaken, by IF Electrical and Security in January 2022 to cover an area of the Hall which had been extensively refurbished. The CCTV system is clearly documented in the Parish Hall's User Policy, a copy of which is displayed on the Council's website and also referenced when Parish Hall bookings are taken.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular:

Sedgefield Town Council are fully compliant with all laws and regulations surrounding the CCTV system and its use. The Town Clerk continuously monitors for any relevant training opportunities promoted via CDALC, NALC and SLCC.

The CCTV Policy details the Town Council's arrangements for compliance.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals.	Likelihood of harm	Severity of harm	Overall risk
Include associated compliance and corporate risks as necessary.	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
Theft of equipment	Possible and probable	Minimal	Low with CCTV

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Misuse of equipment by users	Possible and probable	Minimal to severe	Low to medium
Physical harm to users whilst using equipment	Possible	Minimal to severe	Low to high
Physical harm to users by other users	Remote to possible	Minimal to severe	Low to high
Anti-social behaviour	Probable	Significant	Medium

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in Step 5.				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Anti-social behaviour	CCTV in operation	Reduced to eliminated	Low	Yes
Theft of equipment	CCTV in operation	Reduced to eliminated	Low	Yes
Misuse of equipment by users	CCTV in operation	Reduced to eliminated	Low	Yes
Physical harm to users by other users	CCTV in operation	Reduced to eliminated	Low	Yes

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Step 7: Sign off and record outcomes

Measures approved by:	Sedgefield Town Council (P&R Committee)
Residual risks approved by:	Sedgefield Town Council (P&R Committee)

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