

	CCTV Policy
	BROADSTAIRS & ST. PETER'S TOWN COUNCIL Adopted: 26th March 2018 Reviewed: May 2026 Approved: TBC

1 Introduction

1.1 This policy is to control the management, operation, use and confidentiality of the CCTV system at Pierremont Hall, Pierremont Park, Broadstairs CT10 1JX

1.2 The Broadstairs & St. Peter's Town Council CCTV System currently consists of: A total of 27 cameras. This consists of 8 public space CCTV cameras on the rear elevation of Pierremont Hall CT10 1JX. 11 on the front surround of Pierremont Hall, including those located on the Music Room and Cottage buildings, with 7 internal cameras within the Hall. The system has the capability for an additional 5 cameras, which may be added without notice. All future cameras will be located around Pierremont Hall/Park

1.3 It has been prepared taking due account of the Code of Practice published by the Data Protection Commissioner (July 2000).

1.4 This policy will be subject to periodic review as required by the Town Council to ensure that it continues to reflect the public interest and that the system meets legislative requirements.

2. Aims and Objectives

- To deter crime
- To assist in the detection of crime
- To reduce the fear of crime
- To improve public protection
- To improve the safety and security of residents, visitors and the business community who use the facilities within the areas covered
- To facilitate the apprehension and prosecution of offenders in both criminal and public order offences
- To discourage anti-social behaviour including alcohol and drug related issues
- To deter vandalism
- To assist the Council in monitoring and managing its assets and areas of responsibility
- To enhance the environment and thereby improve the enjoyment of the Council's facilities by all who use them.

3. The System

3.1 The CCTV Scheme will be registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

3.2 The system will be operated fairly, within the law, and only for the purposes for which it was established and which are identified within the Code, or which are subsequently agreed in accordance with the requirements of the Code.

3.3 The public interest in the operation of the system will be recognised by ensuring the security and integrity of operational procedures.

3.4 Throughout the Code it is intended, as far as reasonably possible, to balance the objectives of the system with the need to safeguard the individual's rights. Every effort has been made to indicate that a formal structure has been put in place.

3.5 Should a complaint arise with the use of the system the Town Council's complaints procedure should be used.

4. Siting of Camera and Signage

4.1 Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

4.2 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the CCTV.

5. Monitoring and Recording Facilities

5.1 The CCTV is not routinely monitored. Monitoring will only take place in exceptional circumstances by authorised staff. The CCTV equipment, for the fixed cameras can record all cameras simultaneously throughout every 24 hour period.

5.2 Authorised staff are able to produce hard copies of recorded images, replay or copy any pre-recorded data at their discretion and in accordance with the Code of Practice. All viewing and recording equipment shall only be operated by trained and authorised users.

5.3 Unauthorised persons will not have access to the CCTV system.

5.4 All operators shall be made aware of their responsibilities in relation to the requirements of the Human Rights Act 1998, Data Protection Act 1998, Data Protection Regulations (EU) 2016/679, Regulation of Investigatory Powers Act 2000 and the Codes of Practice and Procedures. Further training will be provided as necessary.

6. Breaches of the code (including breaches of security)

6.1 Any breach of the Code of Practice by Council staff, will be initially investigated by the Town Clerk, in order for him/her to take the appropriate disciplinary action.

6.2 Any serious breach of the Code of Practice will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.

7. Viewing of the Recorded/Live Images

7.1 Screens displaying images of areas under surveillance will be located so that only authorised employees of Broadstairs & St Peter's Town Council or the Police can view the images.

7.2 Control of access to the recorded images will be restricted by the Town Clerk or their designate. The Town Clerk, or their designate, will decide whether to allow requests for access by third parties in accordance with the Town Council's Policies.

7.3 The viewing of recorded images must take place in a secure area to which the public has no access. Unauthorised persons will not have access to that area whilst a viewing is taking place.

8 Retention and Release of Data

8.1 CCTV images will not to be retained for longer than necessary. Data storage is automatically managed by the CCTV digital recorders which use software programme to overwrite historical data in chronological order to enable the recycling of storage capabilities. This process produces a minimum of 30 days rotation in data retention.

8.2 If CCTV images are retained beyond the retention period, they will be stored in a secure place with controlled access and erased when no longer required (on a Council computer).

8.3 Access to the CCTV System and to the captured images will be restricted to authorised staff involved in monitoring or investigation.

8.4 A record will be maintained of the release of media to the Police or other authorised applicants. A register will be available for this purpose.

8.5 Viewing of videos by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

8.6 Should a digital copy be required as evidence, a copy may be released to the Police it will be made clear that the file remain the property of the Council and information contained on it are to be treated in accordance with this code. The Town Council also retains the right to refuse permission for the Police to pass to any other person the file or any part of the information contained thereon. On occasions when a Court requires the release of an original recording this will be produced.

8.7 For the release of all images to the Police or Courts, the following information must be recorded on the form provided:

- The Name(s) of officer(s) viewing the images
- The date on which the images were removed from the System for use in legal proceedings.
- The reason they were removed from the System.
- To whom the images were released e.g. if the images were handed to a police officer, the name and station of that police officer must be recorded and the images signed for by the police officer.
- Any crime incident number to which the images may be relevant.
- The location of the images.

8.8 The Police may require the Town Council to retain the stored files for possible use as evidence in the future. Such files will be properly indexed and properly and securely stored until they are needed by the Police.

8.9 Applications received from outside bodies (e.g. solicitors) to view or release data will be referred to the Town Clerk. In these circumstances data will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances, a sum not exceeding the cost of materials.

9 Subject Access Requests

9.1 Under the Data Protection Act, individuals whose images are recorded have a legal right to view the images of themselves, and to be provided with a copy of the images if requested. The request must be made in writing to the Town Clerk.

9.2 They do not have the right of instant access. Access to images must be granted within 30 calendar days of receiving a request and in line with current Broadstairs & St Peter's Town Council policies.

9.3 The Town Clerk is the officer responsible for dealing with requests under the Data Protection Act from members of the public requesting to view images of themselves.

9.4 No fee is payable under normal circumstances. The Town Council may charge a reasonable fee for the administrative costs of complying with a request if it is manifestly unfounded or excessive, or if further copies of personal information are requested. a sum not exceeding the cost of materials.

9.5 A request to view recorded images may also be made under the Freedom of Information Act 2000 (FOI). The Town Council must respond within 20 working days from receipt of a written request for information under the Act. However, if the images are those of the requester, then that information is exempt from the FOI and should be treated as a data protection Subject Access Request as referred to in 10.1 above. If the requested images are of other people who are individually identifiable, these images would not normally be released. This is because the requester could potentially use the images for any purpose, and the individual concerned is unlikely to expect this. This could constitute unfair processing in contravention of the Data Protection Act.

9.6 The applicant must provide sufficient information for the requested images to be identified, i.e. the location, date and approximate time the images are believed to have been recorded.



Broadstairs & St. Peter's Town Council

Release of CCTV images (Pierremont Hall and Pierremont Hall Grounds)

Name(s) of Officer(s) requesting the images:	
The date of the incident in which the images pertain to:	
The date on which the images were removed from the system:	
The reason they have been removed from the system:	
To whom the images were released (Name, station etc):	
Crime incident number to which the images may be relevant:	
Any additional information:	
Signed:	
Date:	
Signed by BSPTC Officer:	