



## **Farnham Town Council CCTV Policy September 2019**

### **Introduction**

This policy is to control the management, operation, use and confidentiality of the CCTV systems located at Gostrey Meadows, Town Council Offices, Victoria Gardens and internal system within Farnham Town Council Offices and Farnham Depot. The sites are owned or managed by Farnham Town Council.

Farnham Town Council accepts that the management of the Council's CCTV system includes the processing of personal data:

- As it may be possible to identify an individual directly for the information being processed.
- It is possible that, although the data held may not relate to an identifiable individual to Farnham Town Council, it may related to an identifiable individual for another data controller such as the Police.

As such, this Policy acknowledges the following underlying principles surrounding processing personal data set out in Article 5(1) of the General Data Protection Regulation (2018):

Personal data shall be:

- a) processed lawfully, fairly and in a transparent manner in relation to individuals ('lawfulness, fairness and transparency');
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes; further processing for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes shall not be considered to be incompatible with the initial purposes ('purpose limitation');
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed ('data minimisation');
- d) accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal data that are inaccurate, having regard to the purposes for which they are processed, are erased or rectified without delay ('accuracy');

kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed; personal data may be stored for

longer periods insofar as the personal data will be processed solely for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes subject to implementation of the appropriate technical and organisational measures required by the GDPR in order to safeguard the rights and freedoms of individuals ('storage limitation');

- e) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures ('integrity and confidentiality').

### **Statement of Purpose**

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 reduce the fear of crime by persons using the Farnham Town Council owned or managed facilities, so they can enter, enjoy and leave the facilities without fear of intimidation by individuals or groups;
- To reduce vandalism of property and to prevent, deter and detect and protect crime and disorder;
- To assist the Police, the Council and other law enforcement agencies with identification, detection, apprehension and prosecution of offenders, by examining and using retrievable evidence relating to crime, public order or contravention of bye-laws;
- To assist all emergency services to carry out their lawful duties.

### **Changes to the Purpose or Policy**

The CCTV Policy will be discussed by Strategy & Finance Working Group and any major change that would have a significant impact on either the purpose of this policy or operation of the CCTV scheme would be approved at full Council.

### **Responsibilities of the Owner of the Scheme**

Farnham Town Council retains overall responsibility for the scheme.

### **Management of the System**

Day to day operational responsibility rests with the Business and Facilities Manager.

Breaches of this policy will be investigated by the Town Clerk and reported to the Council.

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 a 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 in the secure recording areas.

### **Control and Operation of the Cameras, Monitors and Systems**

The following points must be understood and strictly observed by operators:

- Trained operators must act with integrity and not abuse the equipment or change the pre-set criteria to compromise the privacy of an individual.
- No public access will be allowed to the monitors except for lawful, proper and sufficient reason,

with the prior approval by the Town Clerk or Business and Facilities Manager. The Police are permitted access to tapes and prints if they have reason to believe that such access is necessary to investigate, detect or prevent crime. The Police are permitted to visit Farnham Town Council 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 operator.

- Operators should regularly check the accuracy of the date/time displayed.
- Storage and Retention of Images
  - Digital records should be securely stored to comply with data protection and should only be handled by the essential minimum number of persons. Digital images will normally be erased after a period of 30 days.
- Images will not normally be supplied to the media, except on the advice of the Police if it is deemed to be in the public interest.
- As records may be required as evidence at Court, each person handling a digital record may be required to make a statement to a Police Officer and sign an exhibit label. Any images that are 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 to the Council by the Police and the outcome of its use.
- Any event that requires checking of recorded data should be clearly detailed in the log of incidents, including Crime Numbers (if appropriate) and the Council notified at the next available opportunity.
- Any damage to equipment or malfunction discovered by an operator should be reported immediately to the Town Clerk, Business and Facilities Manager. When a repair has been made, this should also be logged showing the date and time of completion.
- Subject Access Requests
  - Any request by an individual member of the public for access to their own record image must be made to the Town Clerk for consideration and reply, normally within one calendar month in line with the General Data Protection Regulation and the Data Protection Act 2018.

### **Accountability**

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

The Police have been informed of the installation and will be provided with a copy of this CCTV Policy upon request.

Any written concerns or complaints regarding the use of the system will be considered by the Council, in line with the existing complaints procedure.

### **Status**

Farnham Town Council has considered the need for using CCTV and has resolved that it is required for the prevention and detection of crime and for protecting the safety of members of the public. It will not be used for any other purposes.

### **Date of Adoption**

This CCTV was reviewed and adopted by Council on 19<sup>th</sup> September 2019