



Date agreed	Committee	Minute number	Renewal date
12 th June 2023	Environment	85/23.1	June 2024

BUCKINGHAM TOWN COUNCIL CCTV POLICY

1. Introduction

- 1.1 This Policy is to control the management, operation, use and confidentiality of Buckingham Town Council's CCTV system, both at Buckingham Town Council (BTC) properties and using re-deployable CCTV camera units, possibly in other public places owned by other organisations.
- 1.2 To meet Data protection legislation Buckingham Town Council's personal data that is 'processed' must be:
- Processed lawfully and in a fair way.
 - Collected for specified, explicit and legitimate purposes.
 - Adequate, relevant and limited to what is necessary.
 - Accurate and, where necessary, kept up to date.
 - Retained only for as long as necessary Processed securely Demonstrate accountability.
- 1.3 The Information Commissioner's Office code sets out 12 principles for the operation of surveillance camera systems. Each system should:
- Have a defined purpose and legitimate aim.
 - Not impinge on an individual's privacy or human rights.
 - Be operated transparently so people know they are being monitored.
 - Be operated with good governance.
 - Have clear policies, rules and procedures in place.
 - Store no more images/data than strictly required.
 - Have safeguards in place in relation to who can view images/data.
 - Meet relevant and approved standards.
 - Ensure images/data are stored securely.
 - Review systems regularly (at least annually).
 - Be effective in supporting law enforcement.
 - Databases used for matching purposes should be accurate and up to date.

1.4 For the purpose of the Data Protection Act, the Data Controller is Buckingham Town Council.

1.5 This will be carried out in partnership with Thames Valley Police (TVP) Neighbourhood Team.

2 Purpose and Objectives

2.1 The principal purposes of the CCTV system are to deter and detect criminal activity. A Legitimate Interest Assessment has been carried out to ensure that the Town Council has a 'Lawful Basis' for processing CCTV images.

2.2 Buckingham Town Council's CCTV surveillance system has been installed and is monitored in line with the following objectives:

- To assist in the prevention and detection of crime
- To facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order
- To help ensure public safety.
- To protect the Town Council's property

3. Management and operation of CCTV

3.1 The system is operational, it's images and audio are capable of being monitored for twenty-four hours a day throughout the whole year. However, the system will not be continuously monitored and only viewed following an incident or to maintain the system.

3.2 Clear and prominent signage will be placed in the area where CCTV will be used, stating that CCTV is in operation and that the scheme is operated by Buckingham Town Council and giving contact details. These signs ([Appendix C](#)) will be regularly checked to ensure they are still in place and in good condition.

3.3 Recorded material is stored on a hard drive either within the camera unit or securely locked away within the same building. The system is accessible by an encrypted wireless internet connection, via password secured, authorised computers. The images and audio from the CCTV system can be monitored by a limited number of approved Town Council staff only.

- 3.4 The CCTV hard drive system automatically deletes the recorded images and audio after 30 days.
- 3.5 Where new CCTV cameras are to be installed, the Council will carry out a full Data Protection Impact Assessment identifying risks and ensuring compliance with data protection legislation.
- 3.6 The Town Council will work in partnership with Thames Valley Police to establish where there is a need for surveillance.
- 3.7 Locations and details of the Town Council's CCTV cameras are in [Appendix A](#) of this document.

4. Disclosure of recorded material and Subject Access requests

- 4.1 The disclosure of images to law enforcement agencies where a crime needs to be investigated, will always be permitted.
- 4.2 Images or audio will not be released directly to the media, except for identification purposes, and only on the advice of a law enforcement agency.
- 4.3 Individuals have the right to request access to CCTV footage relating to only of themselves and can request a Subject Access Requests (SAR)
- 4.4 All SAR requests must be made via the application form [Appendix B](#); this is to be completed by the applicant and a signed copy will be held on record.
- 4.5 Individuals submitting a SAR for access will be required to provide sufficient information to enable the relevant footage to be identified. For example, the date, time, location, description of the applicant will be required to provide photo ID as proof of identity e.g., driving licence.
- 4.6 Any Images of a third party will be redacted from any SAR disclosures by the Town Council.

5. Retention and erasure

- 5.1 Recorded material will be retained for 30 days for the CCTV footage, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

6. Policy Reviews and Audits

- 6.1 This Policy has been agreed by the Environment committee of Buckingham Town Council
- 6.2 The Town Council will keep this policy under review and will retain it until six months after the date the Town Council stops the relevant processing. The Information Commissioners Office can ask to have access to the policy at any time.
- 6.3 The following will be undertaken at least annually, and more frequently where operational reasons suggest that such review has become necessary (e.g., where re-siting of the camera may be deemed necessary):
- (a) The use, location and direction of coverage of the camera(s) will be reviewed by BTC and TVP.
 - (b) The system will be periodically reviewed to ensure all legal requirements, policies and standards are complied with in practice.
 - (c) The appropriate signage is in place and in good condition.
- 6.7 The CCTV system is registered with the Information Commissioner's Office.
- 6.8 Both a Data Protection Impact Assessments (DPIA) and a Legitimate Interest Assessment (LIA) have been carried out to ensure the CCTV Policy is compliant with the Information Commissioners office guidance.

7. Complaints

- 7.1 Complaints and enquiries about the operation of CCTV within the Council should be directed to the Town Clerk.
- 7.2 The Town Councils Complaint Policy and Privacy Policy can be viewed at:

<https://www.buckingham-tc.gov.uk/wp-content/uploads/2023/04/Complaints-Policy-2022.pdf>

<https://www.buckingham-tc.gov.uk/wp-content/uploads/2022/05/Privacy-Policy.pdf>

Appendix A

List of CCTV Buckingham Town Council camera locations:

Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
Town Centre	Re-deployable CCTV Cameras – ptz cameras with audio, hard drive within units and secure remote access.	1	continuous recording to hard drive, remote secure access by authorised personnel, automatically deleted after 30 days	Not continuously monitored only accessed following report incident or by Police.	History of crime and ASB in the areas to have surveillance. As location busy public area no expectancy of privacy. To deal with the fear of crime
Skate Park	Re-deployable CCTV Cameras – ptz cameras with audio, hard drive within units and secure remote access.	1	continuous recording to hard drive, remote secure access by authorised personnel, automatically deleted after 30 days	Not continuously monitored only accessed following report incident or by Police.	History of crime and ASB in the areas to have surveillance. As location busy public area no expectancy of privacy. To deal with the fear of crime
Town Council Buildings	CCTV on 4 buildings, 1 internal and 11 external fixed cameras, with audio recording to hard drive within building and secured remote access.	12	continuous recording to hard drive, remote secure access by authorised personnel, automatically deleted after 30 days	Not continuously monitored only accessed following report incident or by Police.	History of crime and ASB within those areas covered

Appendix B

Subject Access Requests (SAR) Form:

Buckingham Town Council

Application for CCTV access (Subject Access Request)

Applicant

Name:	Email address:
Postal Address:	phone number:

Details of Request

Date:	Time range:
Description of Request (Who are you looking for):	

Approval of Request

Applicant Name:	Approved by:
Applicants Signature:	Approval Signature:
Photo ID as proof of identity provided:	Y/N

Appendix C



CCTV in operation

**Images are being recorded for the purpose
of crime prevention and public safety.**

**Please contact:
for further information about the scheme.**

The scheme is controlled by:

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