

# BILBROOK PARISH COUNCIL

## CCTV Policy

### 1 Policy Statement

Bilbrook Parish Council (BPC) operates its CCTV system as a deterrent against crime, vandalism, and anti-social behaviour. The Council is a registered Data Controller with the Information Commissioner's Office (ICO), pays the annual data protection fee, and maintains a current Data Protection Registration Certificate. The Council complies with the Data (Use and Access) Act 2025.

### 2 Designated Surveillance Zones

- **Zone 1 (Existing):** Bilbrook Village Hall (Entrance, car park, play park, playing fields, MUGA & Outdoor Gym).
- **Zone 2 (New March 2026):** Multi-Use Games Area (MUGA), Allotments, Skate Park.
- **Zone 3 (New March 2026):** Village Centre (Lane Green Road / Pendeford Mill Lane).

### 3 Recording and Privacy

- **Continuous Recording:** Cameras record 24/7. This is an automated process without live human monitoring.
- **Public Highway (Zone 1 & 3):** The Council recognises that cameras may overlook the public highway. The system is configured to focus on public safety; any capture of private activity is strictly incidental and is not the purpose of the surveillance.
- **No Audio:** The system does not record sound.
- **Retention:** Footage is retained for **31 days** and is automatically overwritten unless required for an ongoing investigation.

### 4 Personnel & Access Security

- **Authorised Users:** Access is restricted to the Parish Clerk, the Village Hall Manager, and specific Councillors designated by formal resolution.
- **Remote Access:** All mobile application access must be protected by Multi-Factor Authentication (MFA).
- **Visual Privacy:** Users must ensure they are in a private location when viewing footage. Viewing CCTV in public areas where members of the public may be able to see the screen is strictly prohibited.
- **Device Loss:** Any loss of a device with CCTV access must be reported to the Clerk immediately to revoke access.

### 5 Operation & Disclosure

- **Police Requests:** Footage is released only upon receipt of a formal written request or during a joint viewing with an officer present.
- **Zone 3 Restriction:** No Council staff, councillors or village hall personnel shall access Zone 3 data independently; access is permitted only when a Police Officer is present or following a formal Schedule 2 request.
- **Subject Access Requests (SARs):** Individuals may request footage of themselves. The Council will redact third parties to protect their privacy. Vague or "manifestly excessive" requests requiring disproportionate staff time may be refused under the 2025 Act.

### 6 Employee Monitoring (Purpose Limitation)

The CCTV system is not intended, and shall not be used, for the purpose of monitoring the work performance, timekeeping, or general conduct of employees.

- Footage will only be reviewed in relation to a member of staff if a specific incident is reported involving a potential criminal offence, a serious breach of Health and Safety, or an incident of gross misconduct that cannot be investigated by other means.
- The system exists for staff protection and premises security, not for routine management supervision.

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### 7 Licensing & Compliance

- **SIA Licensing:** Authorised personnel are employees or officials of the Council using the system for in-house statutory functions (Asset Protection and Public Safety) and are therefore exempt from SIA licensing.
- **Signage:** Clearly visible signs are displayed at entry points, stating the purpose of the CCTV and providing the Parish Clerk's contact details.

### 8 Audit Logs and Accountability

To ensure total transparency and prevent unauthorised use, the Council shall maintain a digital CCTV Access Log.

- **Format and Storage:** The log shall be maintained as a spreadsheet hosted on the Council's SharePoint site. This ensures the log is stored in a secure cloud environment and remains accessible to designated authorised personnel at all times.
- **Mandatory Entry:** An entry must be made in the log every time a user logs into the system to view live or recorded footage (including via mobile applications).
- **Required Details:** Each entry must record the name of the person, the date/time, the specific camera viewed, and the genuine reason for access.
- **Review of Logs:** The Parish Clerk will periodically review the SharePoint Access Log and its version history to ensure the system is only being used for its authorised purposes.

### Record of Changes

Date of Review	Description of Revision
Mar 2025	<ul style="list-style-type: none"> <li>• Replaced "Live Monitoring" with "Continuous Recording" to clarify it is an automated process.</li> <li>• Zone Expansion to included the March 2026 installations (MUGA, Allotments, Skate Park, Woodman Junction).</li> <li>• Incidental Capture: Adopted a stronger legal framework for cameras overlooking the public highway.</li> <li>• 31-Day Retention: Defined a strict time limit for data storage.</li> <li>• Employee Purpose Limitation: Explicitly prohibited checking up on staff performance or timekeeping.</li> <li>• Mobile Security: Mandated Multi-factor authentication (MFA) and being overlooked</li> <li>• Police-Led Access (Zone 3): Added a requirement for Police presence to view high-sensitivity junction footage.</li> <li>• Vexatious SARs: Included the right to refuse disproportionate requests.</li> <li>• Mandatory Audit Log: Added Section 8 and Appendix A to track every instance of system access.</li> </ul>
Sept 2025	Policy Condensed for clarity. 4 & 13 added Chairman of the Twentyman Management Committee 7 & 8 Makes reference to the CCTV being access remotely by authorised individuals. 17. Policy Review added.
Sept 2024	No Changes
Sept 2023	4.0 - CCTV working party removed. 6.5 - Added councillors 7.3 - Added councillors 13.2 - Replaced CCTV working group with the Chairman of the Parish Council 16.1 - Replaced GDPR with UK GDPR
Sept 2022	No changes

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**Appendix A: CCTV Access & Audit Log**

This log spreadsheet must be completed by the authorised user every time the CCTV system is accessed (Live View or Playback).

<b>Date</b>	<b>Time (In/Out)</b>	<b>Authorised User</b>	<b>Zone/Camera Viewed</b>	<b>Reason for Access</b>	<b>Initial</b>