



Policy and Procedure for the use of CCTV

Adopted November 2025

To be reviewed November 2026

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1. .Purpose

The purpose of this policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) within the parish of Woolpit. It is installed to deter criminal activity and to enhance security in the area. The CCTV is in continual operation and is intended for the purposes of:

- Protecting Parish Council buildings and its assets

Promoting the safety of parishioners and visitors

- Supporting the police in a bid to deter and detect crime

- Assisting in identifying, apprehending and prosecuting offenders
- Preventing bullying and/or intimidation by individuals and/or groups
- To reduce crime and anti-social behaviour
- To assist in managing the playing field, car park, open space and play area.

2. Legal and Regulatory Framework

Woolpit Parish Council is the Data Controller for the CCTV data under:

- The UK General Data Protection Regulation (UK GDPR)
- The Data Protection Act 2018
- The Protection of Freedoms Act 2012
- The Surveillance Camera Code of Practice (Home Office)

The Woolpit Parish Council is registered with the Information Commissioner's Office (ICO) and pays the annual data protection fee.

Recognisable images captured by the Woolpit Parish Council CCTV are personal data and will be handled accordingly.

A Data Protection Impact Assessment (DPIA) is in place and will be reviewed annually.

3. Scope

This policy relates directly to the location and use of CCTV installations owned or managed jointly by the Woolpit Parish Council and Woolpit Village Hall Trustees.

CCTV warning signs are prominently displayed in areas where CCTV coverage exists. The placement of the cameras endeavours to ensure that the system will give maximum effectiveness and efficiency, but it is not guaranteed that the system will cover or detect each and every incident taking place in the areas of coverage. It will not be used to monitor public dwellings, except where the cameras unavoidably overlook spaces which are managed by the parish council or village hall).

The CCTV system and any associated equipment will be required to comply with this policy following its adoption by the Parish Council. This policy will be subject to periodic review by the Woolpit Parish Council (WPC), both in its capacity as the parish council which has funded the CCTV system and as Sole Trustee of the Woolpit Recreation Ground Charity (RCN 274791) and the Trustees of the Village Hall Charity (RCN 275859)

4. Location of cameras and recording equipment

The recording equipment is located internally in The Lighting Box at Woolpit Village Hall and is inside a lockable cabinet to which the Woolpit Parish Council Clerk and Village Hall Manager hold keys.

CCTV system cameras are sited externally at Woolpit Village Hall. The cameras viewing angles have been system set and cannot be changed remotely. The electrical components for the cameras are inside a cabinet which is locked. The key to this cabinet is retained by the Woolpit Parish Clerk.

The cameras have been sited so that they capture only images relevant to the Purposes described in section 1 and to comply with current legislation. They have been installed to view:

- The front door of the Village Hall
- The side door of the Village Hall
- The Village Hall Car Park
- The community car park (opposite the church)
- The Recreation Field

5. CCTV Control Group

To ensure compliance with policy and legislation, the CCTV system is managed by a CCTV control group, comprising of two representatives of the Woolpit Parish Council and two representatives of the Woolpit Village Hall.

The CCTV control group will undertake an annual review of the system and document this with Appendix A. It will also document any issues and incidents using Appendix B

Members of this control group are permitted to access the recording equipment for the purposes of retrieving data or to undertake any administrative function. Any contracted maintenance may only be undertaken with the consent of the control group and upon satisfaction of identity and purpose.

Access to the CCTV recording data hard drive is only achievable with a username and password held by the CCTV control group.

The CCTV control group will be responsible for maintaining accurate records of the release of data to the police or any other authorised applicant. They will liaise with the police to facilitate any investigation requiring data access.

Remote access to the system data is permitted to the control group, with a back up login assigned to the Woolpit Parish Clerk should a member of the CCTV control group not be available.

The control group will meet at least twice yearly to review the administration processes and to determine any issue which needs escalation to the Woolpit Parish Council.

6. Storage and retention of CCTV images

Data will not be stored on the CCTV system for longer than 30 days. In the event that images are required for the context of any investigation, the image will be moved to an external flash drive upon completion of documentation. The Data Protection Act and GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the Parish Council's purposes for recording information, and how long it is needed to achieve this purpose

7. Subject Access Requests

Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act and the GDPR.

All requests should be made to the Woolpit Parish Clerk in the first instance, who will then liaise with the CCTV control group. Individuals submitting requests for access will be asked to provide sufficient information to enable footage relating to them to be identified. For example: time, date and location. Appendix C can be offered to the individual if it is helpful to them for formulating their request,

The Parish Council does not have any facility to provide copies of CCTV footage but instead the applicant may view the CCTV footage if it is deemed necessary and it meets required criteria.

The Woolpit Parish Council will endeavour to respond to requests within one calendar month of receiving the request.

The Woolpit Parish Council reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

8. Third Party Requests

There will be no disclosure of recorded data to third parties other than to approved authorised personnel such as the Police and Local Authority investigators.

If there are any concerns as to disclosure, then the CCTV Control group will seek expert advice from a Data Protection Officer in the first instance. The CCTV control group should escalate any concerns of this nature to the Woolpit Parish Council.

9. Complaints

Any complaints relating to the Woolpit Parish Council CCTV system should be addressed to the Woolpit Parish Clerk.

Appendices

Appendix A – Review of Policy and Equipment

| Article | Date reviewed | Reviewed by | Date of next review |
|---|---------------|-------------|---------------------|
| The CCTV system has a named individual with overall responsibility for the system. | | | |
| The camera sitings are in the most efficient position | | | |
| Camera lenses are clear of debris | | | |
| CCTV signs remain in position and are up to date. | | | |
| CCTV hard drive cabinet is locked and the keyholders are still in post. | | | |
| Remote access continues to be available | | | |
| Incident log is available and is current. | | | |
| Ensure data is being overwritten and is not being held for longer than policy describes | | | |
| Subject access requests have received response. | | | |
| Conduct walkaround of the areas under surveillance to ensure data capture. | | | |
| Review policy date and that it has been presented for adoption when appropriate. | | | |

Appendix B

Incident Log

Appendix C – Subject Access

Subject Access Request Form – Woolpit Parish Council

This form is intended to support individuals requesting access to images of themselves captured by CCTV cameras on the Woolpit Parish Council CCTV system.

Please note: CCTV footage from Woolpit Parish Council is normally retained for a maximum of 30 days.

To enable us to respond to your request promptly, please ensure that you provide us with:

- The relevant date, location and approximate time
- A description of what is happening in the footage
- A detailed description of what you were wearing/carrying at the time;
- A recent full-length colour photograph of you

The completed form should be sent to the Clerk at Woolpit Parish Council using the details provided at the end of the form. If you need further assistance, please e-mail:

clerk@woolpitparishcouncil.gov.uk

You are not required to complete this form however it may help you set out your request.

1. Your details

| | |
|-----------------|--|
| Name: | |
| Address: | |
| Post code: | |
| Contact Number: | |
| Email Address: | |

2. Are you the Data Subject (the individual whose personal data is being requested?)

| | |
|-----|---|
| Yes | <p>Please provide proof of your identity, for example a photocopy of a valid passport or photocard driving licence; We may also request proof of address.</p> <p>Please go to section 5 of this form</p> |
|-----|---|

| | |
|----|--|
| No | Are you acting on behalf of the Data Subject with their explicit consent, or with the appropriate legal authority? If so, this must be evidenced in writing and enclosed with this form. You must also enclose proof of the Data Subject's identity and address as described above. Please ensure that you complete sections 3 and 4 of this form |
|----|--|

3. Details of the data subject (only required where this differs from section 1)

| | |
|-----------------|--|
| Name: | |
| Address: | |
| Post code: | |
| Contact Number: | |

4. Legal status in relation to the Data Subject (If you are not the data subject please briefly describe your relationship to them and explain why you are making this subject access request on their behalf)

| |
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5. Information required - Please describe as precisely as possible the nature of the images you are requesting; providing details of the exact date and location involved, together with an approximate time. Please also describe your appearance and what you were doing at the time you believe your image was captured. Please continue on a separate sheet if necessary.

| |
|--|
| |
|--|

6. Submitting this request
7. Please email your completed copy marked to clerk@woolpitparishcouncil.gov.uk Or send the completed copy of this form in a securely sealed envelope marked 'Private and Confidential' to the following address:

Peggy Fuller
Woolpit Parish Council Clerk
Woolpit Institute
The Street
Woolpit
IP30 9RX

Remember to include:

- Proof of your identity (or, if you are not the Data Subject: proof of the Data Subject's identity and address; and any relevant documents which give you the legal authority to make this request)
- A recent full-length colour photograph of you

I understand that it may be necessary for me to provide additional information in order for Woolpit Parish Council to confirm my identity (or that of the Data Subject) and/or locate relevant personal information. The statutory response period of one month specified in data protection legislation will not commence until Woolpit Parish Council is satisfied in this regard and has received any additional information it has requested in order to process this request.

Signature:

Signed by

Date: