



**Dartmoor Forest Parish Council**

**Princetown CCTV Policy**

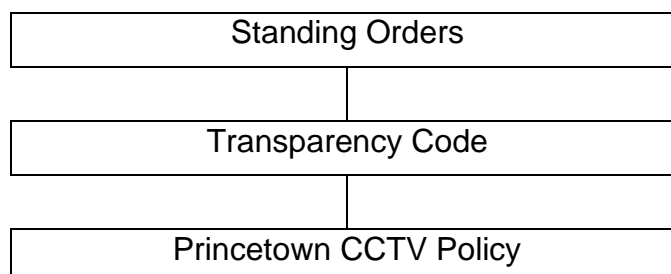
## Record of Amendments and Reviews

<u>Version</u>	<u>Comment</u>	<u>Date of Adoption</u>
1	Adopted	26 January 2021
1	Updated Data Controller Details	June 2023
2	Comprehensive re-write – adopted by Council	Dec 2024

Next review required by:	Dec 2025
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## Document Hierarchy

In the event of any discrepancy between Dartmoor Forest Parish Council Codes, Regulations, Policies, Strategies, Procedures and other documentation, the version contained in the higher level document detailed below will apply, unless changed by a resolution of the council.



## **1. Introduction**

- i. DFPC uses a surveillance camera system to detect and deter crime in Princetown.
- ii. The system comprises four fixed cameras on the Dartmoor National Park Authority (DNPA) Visitors' Centre. None of the cameras have sound recording capability. All cameras are of a high-definition quality and two include Automatic Number Plate Recognition (ANPR) capabilities.
- iii. The CCTV system is owned and operated by the Council and deployment is determined by the Clerk under guidance from the Council. The CCTV footage is downloaded/uploaded remotely by the Council as necessary.

## **2. Data Protection**

- i. The Policy was prepared after taking due account of the General Data Protection Regulations (GDPR) and the Data Protection Act 2018 (DPA). A Data Protection Impact Assessment (DPIA) was completed and approved by the Council in January 2021. This DPIA will be reviewed on an annual basis.
- ii. This Policy will be subject to annual review by the Council to ensure that it continues to reflect the public interest and that it and the system meets all legislative requirements.
- iii. The Council is committed to ensure that the data will be:
  - a. fairly and lawfully processed;
  - b. processed for limited purposes and not in any manner incompatible with those purposes;
  - c. adequate, relevant and not excessive;
  - d. accurate;
  - e. not kept for longer than is necessary;
  - f. processed in accordance with individuals' rights;
  - g. secure;
  - h. not transferred to other countries.
- iv. The person responsible for Data Protection within DFPC is the Clerk. The Clerk is the Parish Council's Data Processor and is responsible for the Council's Data Protection Policy.
- v. The Council is registered with the Information Commissioner under the terms of the Data Protection Act 2018 (registration number: ZA153308). This Policy outlines the Council's use of CCTV and how it complies with regulations.
- vi. All authorised operators (See S11) with access to images are aware of the procedures that need to be followed when accessing the recording images. All operators are aware of the restrictions in relation to access to, and disclosure of, recorded images.

## **3. Compliance**

- i. The Council complies with the Information Commissioner's 'CCTV Code of Practice' and the Surveillance Camera Commissioner's 'Surveillance Camera Code of Practice' to ensure it is used responsibly, and safeguards both trust and confidence in its continued use. In addition, all guidance from the Surveillance Camera Commissioner has been fully considered when developing the system and this Policy.
- ii. In areas where CCTV is used, the Council will ensure that there are prominent CCTV signs displayed, denoting the body responsible for the cameras (DFPC) and their contact details ([CCTV@dartmoorforestparishcouncil.gov.uk](mailto:CCTV@dartmoorforestparishcouncil.gov.uk)), all placed within the controlled area. It is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage. Images are recorded 24 hours per day, every day of the year, and HD quality cameras, with night vision functionality, are used.

#### **4. Siting of the Cameras and Equipment**

- i. Cameras will be sited so that they only capture images relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated. The Council will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act 2018. The Council will ensure that the coverage of the cameras is restricted to public areas.
- ii. The CCTV system equipment is situated within a locked server room in the DNPA Visitor Centre. As of August 2024, the nominated point of contact at DNPA is Steve Crosby, IT manager for DNPA. Tel: 01626 832093. NOTE: this contact does not have access to the CCTV system or cameras.

#### **5. The Purpose of the CCTV Scheme**

- i. The requirements of the scheme were assessed by the Council, in consultation with the local community, Devon & Cornwall Police (DCP), West Devon Borough Council (WDBC) and Dartmoor National Park Authority.
- ii. The overriding purpose of the scheme is to provide a safe and secure environment for the benefit of those who might visit, work or live in the area.

#### **6. The Objectives of the CCTV Scheme are as follows:**

- i. to provide enforcement agencies, specifically from DCP, with evidence of potential criminal activity;
- ii. for formal actions including prosecutions in court and identification of offenders in investigations;
- iii. to reduce the amount of dangerous and anti-social driving in the village, resulting in a material reduction in the noise disturbance and a material reduction in the risk that individuals and property would be hurt and damaged by dangerous driving;
- iv. as a deterrent to other crimes including vehicle theft, vandalism, anti-social behaviour and burglary;
- v. to provide reassurance to the public and provide an effective means of detecting crime and assisting DCP in identifying offenders;
- vi. to deter potential offenders by publicly displaying the existence of CCTV with signage in areas being monitored.

#### **7. Duties of CCTV Operators**

- i. To provide CCTV footage to DCP upon their formal request via [CCTV@dartmoorforestparishcouncil.gov.uk](mailto:CCTV@dartmoorforestparishcouncil.gov.uk) (S10)
- ii. To ensure the efficient and correct operation of the CCTV cameras (S 9)
  - a. All operators to access footage using a secure, password-protected PC. Passwords must be secured using a Password Manager. Appropriate anti-virus software must be installed and updated as necessary. Access to those PC's must be restricted to those operators, through the use of user logins and passwords.
  - b. Operators will use the same viewing software, and ensure this is kept up to date.
  - c. Operators must have the relevant skills and knowledge for the job. DFPC to provide suitable documented training.

#### **8. Provision of footage procedure:**

- i. Clerk receives formal emailed request for CCTV footage from DCP – including the date of interest, which cameras (if not all four), the time from and time to.
- ii. Clerk emails nominated councillors as per (S11ii) and the Chair and Vice Chair, with given parameters of footage request, to include direct official DCP email address of Requestor.
- iii. Nominated councillor accesses the system and downloads the requested footage from CCTV system to their PC.

- a. NOTE: nominated councillor does NOT view or interpret footage
- b. NOTE: this initial download step shall be eliminated where possible, allowing for direct upload from CCTV system to designated DFPC secure Cloud based data storage system (Cloud) if/when available.
- iv. Nominated councillor will then:
  - a. upload footage to DCP (currently using goodSAM) via a link provided by the Requestor, and only if this is not possible, will
  - b. save the footage to a data stick, to be collected by the Requestor.
- v. Councillor will then ensure all downloaded footage is deleted from their PC
- vi. Councillor notifies Clerk that the request has been actioned and the footage uploaded or data stick collected.
- vii. For each occasion of accessing footage, Clerk must document:
  - a. the specified purpose for which the information is being used and accessed
  - b. confirm it is consistent with the stated purposes as outlined in S6
  - c. confirm that the data has been processed for lawful use.
- viii. **Extenuating Circumstances** – only where there is deemed to be an ‘immediate risk to life’ - Officers from DCP may be granted access to review the footage:
  - a. Following a request in person from a DCP Officer, the name, rank and number of that Officer will be noted along with incident number, by the Councillor who is contacted.
  - b. This Councillor will contact one other DFPC Councillor, (by phone) to make them aware of the extenuating circumstances, and request they attend whilst footage is being reviewed by DCP Officer.
  - c. The CCTV footage will be accessed, and Officer/s permitted to view the footage, in the presence of both Councillors. As timing is critical one Councillor can begin the process of accessing the footage for the DPC Officer to review, while second Councillor is on their way.
  - d. If a copy of the footage is then requested by DCP, the date and time frame should be noted and formal request made to Clerk as outlined in S7 & 8i-vii.
- 9. Ensuring efficient and correct operation of cameras procedure:**
  - i. Nominated councillors will log into the CCTV system to check it is working each month (one around the 1st and the other around 15th of each month).
  - ii. They will then log their access to the system on a shared electronic document (‘CCTV Access Log’) on the Cloud, set up by and accessed by the Clerk.
  - iii. The Clerk will access the system once a month to export the System Access Log. This will be used to audit the entries on the CCTV Access Log and compare with any requests for data received.
  - iv. A standing item will be included on the Council meeting agenda to confirm the CCTV system is working and confirm the CCTV Access log is accurate and up to date.
  - v. NOTE: S9iii and iv serve to self-audit that ‘S8 Provision of footage procedure’ is complied with correctly.
- 10. Storage and Retention of CCTV Images**
  - i. Strictly as per ‘S8 Provision of footage procedure’
  - ii. Recorded data on the system will be retained for no longer than 25 calendar days. After 25 days the data is automatically overwritten by the system. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded. All retained data will be stored securely.
- 11. Access to CCTV Images**

- i. Access to the system will be restricted to; the Clerk, two specific named councillors approved and voted in for this purpose by the Council, and the Council's approved technical contractor, and will not be made more widely available.
  - ii. As of August 2024, said persons are:
    - a. Jackie Bennetts, Clerk
    - b. Gregg Manning, Councillor
    - c. Hazel Williams, Councillor
    - d. Robert Castle, Technical Contractor Castle CCTV
- 12. Managing Requests to View CCTV Footage**
- i. Requests to Clerk to view footage must only be accepted from DCP
  - ii. Requests must be emailed to [cctv@dartmoorforestparishcouncil.gov.uk](mailto:cctv@dartmoorforestparishcouncil.gov.uk)
  - iii. Requests from other sources must be advised to contact [cctv@dartmoorforestparishcouncil.gov.uk](mailto:cctv@dartmoorforestparishcouncil.gov.uk) or DCP directly, as appropriate
  - iv. Request must then be managed as per 'S8 Provision of footage procedure'.
- 13. Access to and Disclosure of Images to Third Parties**
- i. There will be no disclosure of recorded data to third parties other than to authorised personnel for the purposes detailed above and for lawful use. This will be specifically authorised personnel from DCP
- 14. Subject Access Requests**
- i. Individuals have the right to request access to CCTV footage relating to themselves under the DPA. All requests should be made in writing to the Clerk using the form set out within this Policy, and each application will be assessed on its own merits. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified.
  - ii. The Council will respond to requests within 14 calendar days of receiving the written request. The 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.
  - iii. Two Councillors will then review the footage and convene a meeting of the CCTV Working Group to discuss the request. The CCTV Working Group will then make a decision to provide the footage or justify why not.
  - iv. Council aims to fulfil Subject Access requests within 28 days of the request being received.
- 15. Complaints**
- i. Complaints and enquiries about the operation of CCTV within the Council should be made using the process set out within the DFPC Complaints Policy, which is available on the DFPC website.
  - ii. The number and nature of complaints received will be published annually on the DFPC website.
- 16. Preventative Measures**
- i. In complying with this Policy, DFPC ensures that preventative measures are in place to guard against misuse of information and images.
- 17. Approved operational, technical and competency standards relevant to our surveillance system and its purpose which we meet:**
- i. Our technical contractor does not currently hold any accreditations/industry standards.
  - ii. To comply with recognised best practice, Council will consider the viability of changing providers and securing certification against these approved standards, when reviewing this policy.

**CCTV Operations System – Data Protection Act 2018**  
**Subject Access Requests – Application Form for the General Public**

**Section 1 – About Yourself**

The information requested below is to help the Parish Council satisfy itself as to your identity, and to find any data held about yourself.

**PLEASE USE BLOCK LETTERS**

Title: (circle as appropriate)	Mr Mrs Miss Ms Other: .....	
Surname:		
First Name(s):		
Maiden Name:		
Gender:		
Height:		
Date of Birth:		
Current Home Address:		
Tel no:		
Email address:		
If you have lived at the above address for less than 3 years, please give your previous address:		

**Section 2: Proof of Identity**

To help establish your identity, your application must be accompanied by **two** official documents that between them clearly show your name, date of birth and current address. For example: driving licence, medical card, passport, birth/adoption certificate, or other official document that shows your name and address. Also, a recent, full-face photograph of yourself. Failure to provide this proof of identity may delay your application.

**Section 3 – Supply of Information**

You have a right, subject to certain exceptions, to receive a copy of the information in a permanent form. Do you wish to:

- (a) Receive a permanent copy: YES / NO  
(b) Only view the information: YES / NO

#### Section 4 – Helping us find the Information

If the information you have requested refers to a specific offence or incident, please complete this section. Please complete a separate box in respect of different categories / incidents / involvement. Continue on a separate sheet if necessary.

Were you (tick relevant box):

A person reporting an offence or incident	
A witness to an offence or incident	
A victim of an offence	
A person accused or convicted of an offence	
Other (please specify):	

Date of incident:

Time of incident - From

Until:

Place incident happened:

Any other useful or identifying information:

#### Section 5 – Declaration - To be signed by the applicant.

The information that I have supplied in this application is correct and I am the person to whom it relates.

Signed: .....

Date .....

Print Name: .....

**WARNING:** A person who impersonates or attempts to impersonate another person may be guilty of a criminal offence. Where impersonation is suspected, the Police will be informed.

Please ensure that all parts of this form have been completed and return a signed hard copy to:  
Parish Clerk, Dartmoor Forest Parish Council. c/o Applegarth, Walkhampton, Yelverton PL20 6JP  
Your request will be processed within 28 calendar days of receipt



**FOR DFPC USE ONLY:**

Application checked and legible?

Date application received:

Identification documents checked?

Documents returned? YES / NO

Details of 2 documents supplied:

Incident report completed? YES / NO

Incident report no.

Councillors viewing the system      Date:

1

2

CCTV Working Group – date convened:

Attending:

Decision to release footage/allow viewing    YES /NO

Reason for not releasing footage/allowing viewing:

Date request completed:

Details of person completing this section:

Name:

Position:

Signature:

Date: