Uffculme Parish Council – Closed Circuit Television (CCTV) Policy

1. Purpose of the Policy
This policy sets out how Uffculme Parish Council manages, operates and governs its CCTV systems installed across Uffculme Village, including the playparks, the Bowling Club and The Square. The policy ensures compliance with the UK GDPR, the Data Protection Act 2018 and the Surveillance Camera Code of Practice.

The purpose of the CCTV system is to:

- Promote community safety
- Deter anti-social behaviour, vandalism and crime
- Protect parish assets
- Assist Devon & Cornwall Police in the investigation of offences
- Provide reassurance to residents and visitors

The system is **not** used for monitoring staff, councillors or routine public behaviour.

2. Scope
This policy applies to:

- All CCTV cameras owned or operated by Uffculme Parish Council
- All footage captured by those cameras
- The Clerk, who is the sole authorised operator
- Any third parties who may receive footage (e.g. Police)

The policy does **not** apply to privately owned CCTV systems.

3. System Description
Locations
CCTV cameras are installed at:

- Uffculme Skate Park and BMX
- Highland Terrace War Memorial Playgrounds
- Uffculme Bowling Club
- The Square
- Any additional public-interest locations approved by Council

Technical Features

- Video only (no audio recording)
- Fixed-point cameras with no facial recognition or analytics
- Time/date stamped footage
- Encrypted local storage
- Automatic 30-day deletion cycle

4. Lawful Basis
The lawful basis for processing CCTV footage is:
Article 6(1)(e) – Public Task
Necessary for crime prevention, public safety and protection of parish assets.
Article 6(1)(f) – Legitimate Interests
Where relevant for the protection of council property and community wellbeing.

Special Category Data
Not intentionally captured. Any incidental capture is processed under **Article 9(2)(g)** (substantial public interest).

5. Governance & Responsibilities
Data Controller
Uffculme Parish Council
System Operator
The Parish Clerk is the sole authorised person with access to the CCTV system.
Responsibilities of the Clerk

- Ensure secure operation of the system
- Control access to footage
- Maintain access logs
- Respond to police requests
- Ensure compliance with retention periods
- Report any data breaches to the Council and ICO where required

Responsibilities of the Council

- Approve the CCTV policy
- Review the DPIA annually
- Ensure signage is maintained
- Oversee compliance with legislation

6. Access to Footage
Internal Access

- Only the Clerk may access footage.
- West Country Tech (installers) have the ability to access data if footage is required for a formal complaint or legal matter.

External Access
Footage may be disclosed only to:

- Devon & Cornwall Police, upon formal written request
- Legal representatives where required by law
- Insurance providers where necessary for claims involving parish property

Footage is not shared with members of the public, media or private organisations.
All disclosures are logged.

7. Retention & Storage

- Footage is retained for 30 days.
- Automatic deletion is enabled.
- Footage required for police investigations may be retained longer, with justification recorded.
- Footage is stored on encrypted parish-owned equipment.
- No cloud storage is used unless required for evidential transfer.

8. Signage & Public Awareness
Clear signage is displayed at all CCTV locations stating:

- That CCTV is in operation
- The purpose of the system
- The Data Controller (Uffculme Parish Council)
- Contact details for enquiries

The Council publishes a CCTV Privacy Notice on its website.

9. Data Subject Rights
Individuals have the right to:

- Raise a Subject Access Request to request access to footage in which they appear
- Request correction of inaccurate data
- Request deletion of footage (where lawful)
- Raise concerns or complaints

Requests must be made in writing to the Clerk. Footage containing third parties may be redacted or refused where disclosure would be unlawful.

10. Security Measures

- Password-protected system
- Encrypted storage
- Access logs maintained
- No remote access except via secure VPN
- Regular maintenance and contractor support
- Incident reporting procedure in place

11. Breach Management
Any suspected data breach must be reported immediately to the Clerk and the Council. Where required, the Clerk will notify the ICO within 72 hours.

12. Review & Audit
This policy will be reviewed:

- Annually
- When new cameras are installed
- When technology changes
- After any incident or complaint involving CCTV

The DPIA will be updated alongside the policy.

13. Policy Adoption
This CCTV Policy was adopted by Uffculme Parish Council on: 7th September 2026