



MELKSHAM WITHOUT PARISH COUNCIL

CCTV Policy

1. Introduction:

This policy outlines the principles, purpose, operation, and management of Closed-Circuit Television (CCTV) systems operated by Melksham Without Parish Council. It is designed to ensure transparency, accountability, and public reassurance that all CCTV related activities are carried out in full compliance with the law.

By implementing this policy, the council acknowledges that the use of CCTV involves the collection of personal data. As such, it is committed to managing this data securely, lawfully, and in accordance with the Data Protection Act (DPA), the General Data Protection Regulation (GDPR), and other relevant legislation. The council will ensure that the use of CCTV images is always necessary, justified, and proportionate.

All CCTV images are handled in accordance with this policy and are used to capture identifiable individuals' activities for monitoring and recording purposes. Melksham Without Parish Council uses CCTV footage for the prevention, identification, and reduction of crime, to promote safety and security, to protect legitimate interests, and to support health and safety.

This policy is to control the management, operation, use and confidentiality of the CCTV systems at the following locations:

- Bowerhill Sports Pavilion, Westinghouse Way, Bowerhill, Melksham, SN12 6TL
- Melksham Without Parish Council demise, First Floor, Melksham Community Campus, Market Place, Melksham, SN12 6ES

The systems are operational but are not monitored for 24 hours a day. While real-time monitoring is not routinely carried out, authorised personnel have the ability to access live feeds in response to specific incidents, for example when the pavilion alarm has been triggered.

2. Purpose:

The policy serves to guide council staff in fulfilling their legal responsibilities when handling personal data obtained through surveillance. Melksham Without Parish Council is the owner and manager of the CCTV system, serving as the system operator and data controller. All staff members must adhere to this policy. Failure to comply may lead to disciplinary action or dismissal. Contractors working with the council are also subject to this policy. Staff members operating the CCTV system will receive training on its proper use and privacy considerations. The council will respect individuals' privacy while operating the CCTV system.

The CCTV system will be used to observe the Bowerhill Sports Pavilion building and campus office lobby area for incidents that require a response. All activities related to the CCTV system must be conducted professionally, ethically, and legally. Any misuse of CCTV for purposes not outlined in this policy is strictly prohibited.

CCTV surveillance is used to monitor and collect visual images for:

- a) Protecting the council's assets and prevention and detection of crime.
- b) Promoting the health and safety of visitors, employees and councillors.
- c) Reducing the incidence of crime and anti-social behaviour (including theft and vandalism.)

Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:

- a) Cover the specific area to be monitored only
- b) Keep privacy intrusion to a minimum
- c) Ensure that recordings are fit for purpose and not in any way obstructed
- d) Minimise risk of damage or theft.

CCTV will not be publicly accessible and will only be accessed by trained staff members.

3. Location & Signage:

Cameras are strategically positioned to effectively monitor the Bowerhill Sports Pavilion building only and council office lobby area. There is a video doorbell on the entrance to the lobby which records people at the entrance to the parish council demise. It has an audio facility that can be used when people have pressed the doorbell so that officers can speak to the person if they are not in the office. The parish council acknowledges that the council office is located in a shared building and as such, have taken steps to only capture footage directly impacting the office area by implementing privacy masks on their video doorbell system.

The placement of the equipment is thoughtfully planned to ensure that the recorded images adhere to data protection regulations. Informative signs are located to notify both the public and employees about the CCTV operation. The signs specify the purposes, system ownership, and contact information for further information about the scheme.

4. Monitoring & Recording:

Cameras are not normally monitored in real time. If a staff member on the pavilion alarm call out list is called out due to the alarm being triggered, they will review the footage from that specific timeframe before attending the site. This may involve reviewing footage in real time, depending on the circumstances of why the intruder alarm has been triggered. This is for their own safety, prior to attending the building..

- Images are recorded on secure servers and accessible only to authorised personnel. For the Bowerhill Sports Pavilion, both the Clerk and Finance & Amenities Officer are key holders and positioned first and second respectively on the alarm call out list, therefore have access to the CCTV on their personal mobile devices. In addition, they have access to the CCTV on their parish council laptops for the same reason.
- The CCTV for this site has also been installed on the meeting room computer which all officers have access to.
- The CCTV is also located in the switch room of the Bowerhill Sports Pavilion, where only key holders can access.

Recorded material is stored securely to maintain image integrity and ensure reliable metadata recording.

For the CCTV system at the **Bowerhill Sports Pavilion**: The system is securely locked inside the switch room of the Bowerhill Sports Pavilion building, with only officers on the alarm call out list having keys to the building. It is noted that keys to the pavilion building are located in the council offices, therefore all officers have access to the keys. The CCTV system is password protected and is kept on a password protected list on the parish council's shared drive. Only the three council officers in the office have access to the password list. As already stated, in this policy, the system does have the ability to view footage remotely (please see information detailed above). The CCTV system is managed by Kanconnections who only have on site access to the system which has to be approved by officers prior to them attending the site. It is important to note that this contractor will only be accessing this system in the event that there is an issue with the CCTV that needs to be repaired.

CCTV must only be accessed in response to an incident or concern, such as an alarm call out, suspicious activity, or a formal request for footage. In the event of an alarm call out at the Bowerhill Sports Pavilion, officers may take a trusted person/family member with them for their own safety out of hours. As per the protocol, officers are able to access the CCTV system in the switch room to view footage, and the trusted person should also be able to view this with them so that they are aware of what is going on around the building. This also applies to a member of Security 2000 who provide security services on the Bowerhill Industrial Estate, and if available will accompany the officer to the pavilion. This is the only exception to the rule.

For the CCTV system inside of the **parish council lobby area and on the video doorbell**: The office CCTV system can be accessed through the ubiquiti website or mobile app by the council's three officers (Clerk, Parish Officer, and Finance & Amenities Officer), as well as the council's IT contractor (Avon IT Systems) and Sensical Services Ltd who set up the system. Sensical Services Ltd will assist the parish council in the event of an issue with the system. Each person who has access has their own password. The audio facility on the video doorbell is only activated when a person presses the doorbell and is used solely for communication. Audio recordings are not routinely monitored or retained beyond the standard CCTV retention period

CCTV must only be used in the event that an incident has occurred or in response to a specific concern, such as an alarm being triggered.

All images recorded by the CCTV system are the property and copyright of Melksham Without Parish Council.

5. Covert surveillance:

Covert surveillance is the use of hidden cameras or equipment to observe and/or record a subject's activities without their knowledge.

The parish council will not engage in covert surveillance.

6. Facial recognition:

The council's system does not offer this function.

7. Data Protection Impact Statement:

The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment, which identifies risks related to the installation and ensures full compliance with data protection legislation.

8. Applications for Disclosure of Images:

In certain situations, disclosure of images to a third party may be necessary, such as when required by law or for crime prevention. When disclosing information, it is crucial to ensure a secure transfer. Surveillance recordings should not be copied, distributed, or used for any other purpose.

Data will only be shared with the following third parties under specific circumstances upon request

- Data subjects in relation to a subject access request, unless any disclosure would prejudice any criminal enquiries or investigations. Or if it contravenes the data protection rights of any third party who may be in the footage whose identity cannot be protected.
- Statutory prosecuting authorities, e.g., law enforcement agencies, where the data would assist with a specific criminal inquiry, OR prosecution agencies,

where the data would assist in the prosecution of anti social behaviour and/ or a criminal activity.

- Insurance providers are investigating claims with regard to anti social behaviour and/ or criminal activity, damage to property, or personal injury occurring on Parish Council premises.

No other organisation will have access to the data.

Individuals requesting access to CCTV footage in which they appear must submit a formal Subject Access Request (SAR) in writing to the parish council. The request must include sufficient information to enable identification of the individual in the footage (e.g., date, time, location, description of appearance) and must be accompanied by proof of identity (e.g., passport or driving licence- Please refer to the parish councils subject access request policy for full details of the forms of identification the parish council accepts).

A trained member of staff will review the requested footage to confirm the presence of the data subject and ensure that disclosure does not infringe on the data protection rights of any third parties. If the relevant footage is identified and disclosure is lawful, the individual will be invited to view the footage during an onsite visit.

The viewing will take place in a private area where it cannot be observed by unauthorised individuals. If it is not possible to redact or obscure the identities of other individuals in the footage, access may be limited or refused in accordance with data protection law.

If copies of the footage are required to be released, this will only be provided where lawful and feasible. The footage may either be supplied via email through a secure link for only that individual to view or downloaded onto an encrypted USB drive. The USB device will be labelled and needs to be collected from the parish council office by the individual requesting the recording.

Requests for access to CCTV footage by law enforcement agencies (e.g. police) must be made in writing and should include the following:

- The reason for the request, including the specific incident under investigation
- The date, time, and location of the footage required
- Legal basis under the Data Protection Act 2018
- The name, rank, and contact details of the requesting officer or authority

Requests should be submitted to the Clerk or officer authorised to handle such requests.

Requests for CCTV footage from insurance companies will be treated on a case-by-case basis and only approved where a lawful basis exists and disclosure is considered necessary and proportionate.

Where a valid request is received:

A trained member of staff will review the footage to confirm the existence of relevant content. Footage will only be disclosed if they are satisfied that the request is lawful, necessary, and proportionate.

Disclosures will be logged, including the date, name of the requester, reason for disclosure, and footage provided. Footage may be provided via secure email link or encrypted USB, or the officer may be invited to view the footage on site.

No footage will be shared unless a valid legal basis exists and the disclosure is in compliance with data protection law.

9. Retention of images:

The system will automatically overwrite the CCTV footage at the Bowerhill Sports Pavilion after 21 days and the parish council office after 34 days unless there is a legitimate reason, such as an ongoing police investigation, that requires this data to be kept for longer.

In exceptional circumstances, such as a request from law enforcement or in connection with a formal investigation, the standard retention period may be overridden by a trained and authorised officer. An authorised member of staff would need to manually extract the data, either by downloading it and saving it to a secure folder or by downloading it to a USB stick. This would only be for law enforcement or prosecution agencies.

Manually extracted footage will be retained only for as long as necessary and will be securely deleted once no longer required.

Access to CCTV footage is limited to authorised individuals

10. Access Management:

Access rights to CCTV systems will be reviewed annually and immediately updated when personnel change. Any access granted to staff, contractors, or councillors will be revoked upon leaving the council or completing their contractual duties

11. Review Procedure:

There will be an annual review of the use of the CCTV system to ensure it remains necessary, proportionate, and effective in meeting the stated purposes.

As part of the review the Council will assess:

- Whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation.
- The monitoring operation, e.g. if live monitoring in any or all camera locations is necessary.
- Whether there are alternative and less intrusive methods for achieving the stated purposes.

Recommended by the IT Working Party on 28th November 2025 and adopted by the Full Council on 8th December 2025

Version control:

Version	Date and meeting	Changes made
1.0	Recommended by the IT Working Party on 28th November 2025 and adopted by the Full Council on 8th December 2025. (Min. 360/25b)	No changes- adoption of new policy