



## **CCTV Policy**

Premises covered: The Pavilion, Tithes Lane, Tickhill

Date of adoption: 30<sup>th</sup> September 2025

Reviewed 26<sup>th</sup> May 2026

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### **INTRODUCTION**

There is an increasing range of technologies available for the prevention and detection of crime and antisocial behaviour, many of which capture personal data on individuals. In the case of images, these are increasing in definition, and more easily able to be distributed.

Whilst these technologies provide better opportunities for Tickhill Town Council to prevent and detect crime and antisocial behaviour, we realise that this must be balanced against an individual's rights of privacy, and that unwarranted and excessive use of surveillance technologies has contributed to a tougher regulatory landscape.

This policy is therefore designed to address both the powers and obligations of the Council, and the legislation protecting the rights of individuals, to ensure that the Council's use of CCTV is lawful, safe, and reasonable.

### **1. LEGAL BASIS**

The CCTV system is operated in accordance with applicable data protection laws.

The power for a parish council to install CCTV and other surveillance equipment is granted under Local Government and Rating Act 1997 s.3.

The Council has a duty to consider crime and disorder implications of their functions, under the Crime and Disorder Act 1998 s.17. A relevant authority must have regard to the surveillance camera code [created by s.29 of the Act] when exercising any functions to which the code relates.

The Policy Statement below further addresses the best practice set out in the surveillance camera code.

### **2. PURPOSE OF THE POLICY**

The purpose of this policy is to regulate the management, operation, and use of the CCTV system at The Pavilion, Tithes Lane, Tickhill. The policy is intended to ensure that

Tickhill Town Council operates the CCTV system in compliance with the General Data Protection Regulations (GDPR), the Information Commissioner's Office (ICO), CCTV Code of Practice and any other relevant legislation to ensure it meets its legal responsibilities. The CCTV cameras are used in the detection and prevention of crime and not for monitoring staff performance or personal behaviour of any individuals unrelated to crime prevention.

### **3. ABOUT THIS POLICY**

Tickhill Town Council is required to adhere to the GDPR, with respect to all information or data held about our hirers, volunteers, contractors and visitors including any data captured on CCTV.

It has installed closed-circuit television (CCTV) for the following purposes:

- To assist in the prevention and detection of crime
- To increase personal safety and reduce the fear of crime
- To assist with the potential investigation and identification of potential offenders
- To protect the Pavilion's building and property
- To assist in the management and monitoring of Pavilion facilities including the investigation of accidents
- As a means of assistance to hirers of the Pavilion in the event of emergency situations

Tickhill Town Council shall ensure that sufficient signage is in place in all areas covered by any surveillance system, and that the Council's privacy policy, CCTV policy, complaints policy, and other relevant documents are published on its website.

### **4. REASONS FOR COLLECTING YOUR DATA**

We have a legitimate interest to collect data to ensure the safety of the property and those who choose to use the space.

### **5. WHAT DATA WE COLLECT**

We only collect video data and purposely do not collect audio/sound. The static cameras located at the Pavilion have been directed where they will not focus on private homes gardens or other areas of private property and the cameras only record the external space within the perimeter of the Pavilion, the car park and tennis courts. Their position is checked on a regular basis to ensure that they have not moved and any recordings are pushed to a password protected recognised cloud-based storage system supplied by Hik-Connect.

### **6. WHY WE COLLECT DATA**

As the Pavilion is not manned 24/7 we wish to ensure its safety against potential crimes and vandalism as well as ensuring the people and organisations who use the facilities feel safe.

## **7. WHO HAS ACCESS TO THE DATA?**

The following people are authorised to view images and footage captured by the CCTV system via the SD cards or the Hik-Connect app.

- Data controller – Tickhill Town Council
- Data Handler – Clerk/Proper Officer
- Data Processor – Securite Ltd
- The External CCTV providers (engineers for the purpose of maintenance) or police personnel on request.
- Any other third party such as the Police/Law Enforcement required to assist in the identification of a data subject following an incident -upon request.
- Data subject –any individual whose personal information is captured by the surveillance equipment on completion of a Subject Access Request (SAR) form.

If you believe you have discovered a security vulnerability in our cloud storage, please report it to Hik-Connect. You can report a data breach to ICO and/or the Clerk at [clerk@tickhilltowncouncil.gov.uk](mailto:clerk@tickhilltowncouncil.gov.uk).

## **8. HOW WE USE YOUR DATA.**

The CCTV footage is never routinely monitored in real-time by any of those authorised to access as we respect the privacy of our community and is solely for the purpose of personal identification should an incident take place.

The data captured will never be used for commercial gain, social media or be shared for any other purpose other than those highlighted in this policy.

Tickhill Town Council will never use any form of facial recognition or other biometric characteristic recognition system.

## **9. HOW LONG DO WE RETAIN THE DATA AND WHY**

Recorded images and footage will be retained only for as long as necessary and will not be kept for more than 28 days. The system is configured to store a rolling 28-day archive, meaning only footage from the most recent 28 days is available for playback. After this period, footage from the earliest day is automatically overwritten by new recordings without review, unless there is a legitimate reason for it being accessed and viewed. This is a continuous, automated process that cannot be paused or manually altered.

Access to, viewing, saving, or sharing of CCTV footage is strictly limited to specific circumstances, such as a request from a law enforcement agency during a criminal investigation, or for insurance purposes as part of an active claim.

In such cases, relevant footage may be saved and securely transmitted (e.g., emailed to an authorised third party), or exported onto a secure external drive or USB device, following appropriate handling procedures.

Where footage is shared with a third party a record will be maintained of what was shared, with whom and the reason for the disclosure. Any images retained beyond the standard 7-day access period will be documented in an operational file, including the justification for their continued retention.

Only footage directly relevant to the request will be disclosed. Identifiable images of unrelated individuals (e.g., bystanders) will be blurred or redacted. If redaction is not possible due to software limitations or other technical constraints, the footage will not be released to ensure compliance with data protection obligations.

## **10. WHO WILL WE SHARE THE DATA WITH**

Information stored on the system constitutes personal data as defined by the GDPR. An individual may request to see images of themselves via a Subject Access Request Form (SAR).

Tickhill Town Council will never disclose any recorded data to third parties other than the authorised organisations such as the Police and others given permission by the data handler for a specific purpose, for example other investigations.

## **11. WHO IS COVERED BY THE POLICY**

The following people and organisations are covered by this policy:

- Data controller and data owner – Tickhill Town Council
- Data Processor – Securite Ltd
- System user – meaning such officers or other staff authorised to use the surveillance equipment
- Data subject – any individual whose personal information is captured by the surveillance equipment

## **12. INDIVIDUALS RIGHTS UNDER DATA PROTECTION LAW**

CCTV footage is personal data and individuals have rights under applicable data protection law including the right to:

- Access your personal data

- Correct incomplete or inaccurate personal data we hold about you
- Erase the personal data we hold about you
- Restrict our handling of your personal data
- Transfer your personal data to a third-party
- Object to how we use your personal data
- Withdraw your consent to us handling your personal data

An individual may request to see images of themselves via a Subject Access Request Form (SAR).

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

Tickhill Town Council does not have a facility to provide copies of CCTV footage except as outlined in clause 10 of this policy but instead the applicant may view the CCTV footage if available.

Tickhill Town 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.

### **13. POLICY REVIEW**

GDPR is an ongoing process. This policy will be reviewed every 2 years and updated when necessary to ensure continued compliance with changing regulations.

Please keep in mind that data protection law is complicated and these rights won't always be available to you all of the time. You also have the right to lodge a complaint with us or the ICO, the supervisory authority for data protection issues in the UK.

If you wish to exercise any of these rights or have any questions, please contact the Clerk by emailing [clerk@tickhilltowncouncil.gov.uk](mailto:clerk@tickhilltowncouncil.gov.uk).

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Adopted by Full Council

Reviewed by full council at the Annual Meeting on 26th May 2026

Next Review date: May 2027 or as legislation changes