

AXMINSTER TOWN COUNCIL

CCTV Policy (draft)

**To be considered by Axminster Town Council on 30th March 2026
Draft CCTV Policy v1 – PGH/March 2026**

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1. Purpose

1.1 The Purpose of this policy is to regulate the management, operation and use of the CCTV systems (Closed Circuit Television) operated and managed by Axminster Town Council.

CCTV systems are in 24-hour continuous operation at:

- i) Axminster Town Centre (Trinity Square)
- ii) Axminster Guildhall (internally and externally)
- iii) Axminster Municipal Cemetery

for the purpose of enhancing security of the area, providing assurance to residents & visitors and protecting equipment and assets. The CCTV surveillance is in continual operation and is intended for the purposes of:

Protecting Town Council buildings, equipment and assets

Promoting the health and safety of residents and visitors

Preventing bullying and/or intimidation by individuals and/or groups

To reduce crime and prevent/deter anti-social behaviour

Supporting the Police to deter and detect crime

Assisting in identifying, apprehending and prosecuting offenders

1.2 The CCTV systems are owned and operated by Axminster Town Council at all three locations specified above but, in some cases, are hosted and resourced via 3rd party buildings and structures with the owner's prior consent.

1.3 The introduction of, or changes to, CCTV monitoring will be subject to consultation with members of the Town Council and be subject to a business case report.

1.4 The CCTV systems are registered with the Information Commissioner's Office (ICO) and are operated in accordance with the requirements of the General Data Protection Regulations and the Information Commissioner's Code of Practice.

2. Scope

2.1 This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material. The Town Council complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards and ensures both trust and confidence in its use.

2.2 CCTV warning signs will be prominently placed in areas where CCTV is used, with contact details of the Town Council and Data Protection Officers.

2.3 The placement of the cameras will endeavour to ensure that the systems will give maximum effectiveness and efficiency, but it is not guaranteed that the systems will cover or detect every single incident taking place in the areas of coverage. Video monitoring of public areas for security purposes within the Town Council is limited to uses that do not violate the individual's reasonable expectation to privacy.

2.4 All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Town Council. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the General Data Protection Regulation and Data Protection Act 2018 (*see Council's Data Protection and Privacy Policies*)

3. Location of Cameras

3.1 The cameras are sited so that they only capture images relevant to the purposes for which they have been installed and care will be taken to ensure that reasonable privacy expectations are not violated. The Town Council will ensure that the location of future equipment is carefully considered to ensure that the images captured comply with the legislation.

3.2 CCTV Video Monitoring and recording of Public Areas may include the following:

Protection of buildings and property: vandalism, theft

Criminal investigations (carried out by the police): Robbery, burglary and theft surveillance

4. Storage and Retention of CCTV Images and footage.

4.1 Recorded data will not be retained for longer than 30 days except where the image identifies an issue and is then retained specifically in the context of an investigation or prosecution of that issue.

4.2 Where data is retained for longer than 30 days, an electronic file held on a secure central server where specific CCTV image/recordings retained will be kept. The Data Protection Act 2018 and GDPR do not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the Town Council's purposes for recording information, and how long it is needed to achieve this purpose.

4.3 The Town Council will store data securely at all times as per the Council's Data Protection protocols and policy.

5. Access to CCTV Images

5.1 Access to recorded images will be restricted to the Town Clerk (or any other person specifically granted prior permission by the Town Council). The Town Clerk is currently the Data Protection Officer and holds an accredited SIA qualification (CCTV Public Space Surveillance).

In line with Data Protection good practice, the CCTV is located in a secured room with no access to non-authorized persons and which is locked when not in use. Monitoring equipment and camera access will be controlled by password or multi-factor authentication log-in.

6. Access Requests

6.1 Individuals have the right to request CCTV footage relating to themselves under the Data Protection Act 2018 and the UK GDPR.

6.2 All requests should be made to the Town Clerk. 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.*

6.3 The Town Council does not have facilities to provide copies of CCTV footage but instead the applicant may view the CCTV footage if it is deemed necessary and it meets certain criteria.

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

6.5 The 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.

7. Access and disclosure of images to third parties

7.1 There will be no disclosure of recorded data to third parties other than authorised personnel, such as the Police.

7.2 If there are any concerns as to disclosure, then the Town Council should seek advice from the designated Data Protection Officer in the first instance and appropriate legal advice may be required, including referrals to The Information Commissioner's Office.

8. Responsibilities

8.1 The Town Council retains overall responsibility and will:

Ensure that the use of CCTV systems are implemented in accordance with this policy.

Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the Town.

Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy.

Ensure that the CCTV monitoring is consistent with the highest standards and protections.

Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy.

Maintain a record of access (e.g. an access log) to or the release of any material recorded or stored in the system.

Ensure that the perimeter of view from cameras conforms to this policy.

Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the Town Council and be mindful that no such infringement is likely to take place.

Ensure that cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy".

Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy.

Ensure that camera control is solely to monitor suspicious behaviour, criminal damage, prevention of crime, safeguarding, public safety etc. and for no other purpose including the non-essential surveillance of the public and/or Council employees.

Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas.

9. Data Protection Impact Assessments and Privacy by Design.

9.1 CCTV has the potential to be privacy intrusive. The Town Council will perform a privacy impact assessment when installing or moving CCTV cameras to consider the privacy issues involved with using new surveillance systems to ensure that the use is necessary. An annual servicing of the system to ensure everything is fully functioning should be carried out by qualified personnel only.

10. Policy Review

10.1 The Town Clerk is responsible for monitoring and reviewing this policy. In addition, changes to legislation, national guidance, codes of practice or commissioner advice may trigger interim reviews.

11. CCTV Signage

11.1 It is a requirement of the Data Protection Act to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The Town Council is to ensure that this requirement is fulfilled. The CCTV sign should include the following:

That the area is covered by CCTV surveillance and pictures are recorded.

The purposes of using CCTV.

The name of the Town Council.

The contact telephone number or email address for enquiries.

Adopted by Full Council:

30th March 2026

For review by Full Council

March 2027