



GREAT DUNMOW TOWN COUNCIL

CLOSED CIRCUIT TELEVISION (CCTV) & AUTOMATIC NUMBER PLATE RECOGNITION (ANPR) CODE OF PRACTICE

Version	Adopted Policy Date	Minute Reference	Review Date
1	19/07/2018		
2	04/09/2025	FC75vii	September 2028

INTRODUCTION

1. This Code of Practice controls the management, operation, use and confidentiality of the CCTV systems at the locations listed within this document. It sets out to comply with best practice in the CCTV Code of Practice, the Charter for a democratic use of video-surveillance, and other relevant guidance.
2. This policy will be subject to annual review by Great Dunmow Town Council to ensure that it continues to reflect the public interest and that it and the systems to which it refers meet all legislative requirements, principally:
 - the Data Protection Act 2018
 - the Human Rights Act 1998,
 - the Regulation of Investigatory Powers Act 2000
 - the UK General Data Protection Regulation (UK GDPR)
3. The council also embraces best practice and protocols set out in national guidance, including:
 - the CCTV Code of Practice,
 - the Charter for a democratic use of video-surveillance
4. This policy aims to ensure that the council's CCTV installations are correctly and efficiently installed and operated.
5. The council accepts the principles of the UK GDPR and the Data Protection Act 2018 and upholds the Data Protection Principles as follows, which require that data must:
 - be fairly and lawfully processed
 - be processed for limited purposes and not in any manner incompatible with those purposes
 - be adequate, relevant and not excessive
 - not kept for longer than is necessary
 - be processed in accordance with individuals' rights
 - be secure
 - not be transferred to countries with inadequate protection
 - be subject to guidance on good practice

The Systems

6. The council currently controls seventeen CCTV cameras, covering the following areas:

Camera 1	War Memorial
Camera 2	Casa and Boars Head PH
Camera 3	High Street (east)
Camera 4	Town Square
Camera 5	White Street car park
Camera 6	Market Place
Camera 7	Stortford Road/Saracen's Head PH
Camera 8	Stortford Road (west)
Camera 9	Angel Lane car park
Camera 10	Angel Lane car park
Camera 11	Stortford Road/Foakes House
Camera 12	Stortford Road/E.T. Foakes Memorial Hall
Camera 13	Stortford Road (west)
Camera 14	Star Lane/Doctors Pond
Camera 15	Star Lane
Camera 16	Doctors Pond
Camera 17	Tennis courts

7. Images are sent wirelessly by broadband from the cameras to the monitoring equipment at Foakes House.
8. The system has the capacity to be connected to two cameras located in Felsted and may be used in conjunction with Automatic Number Plate Recognition Systems (ANPR).
9. In addition, there is one camera installed on the side of the E.T. Foakes Memorial Hall, installed and maintained by Dunmow Alarms & Telecoms Ltd. for surveillance of the council's van when parked in the car park. It is a PTZ dome camera, and the recording equipment is located within the Hall.

Purpose

10. The public CCTV network is used for the following purposes:
 - to reduce the fear of crime
 - to reduce the likelihood of vandalism of property and to prevent, deter and detect crime and disorder

- to assist the council, and the police and other law enforcement agencies, with identification, detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime, public order or contravention of bye-laws
- to deter potential offenders by publicising the existence of the CCTV network, having cameras clearly sited that are not hidden, and signs on display
- to assist all emergency services to carry out their lawful duties

System management

11. All administration and footage processing takes place at Foakes House, Stortford Road, Great Dunmow.
12. The CCTV operating system will be administered and managed by the Town Clerk, in accordance with the principles and objectives expressed in this policy document.
13. Cameras are not live monitored, only pre-recorded footage is viewed by council officers; however, Essex Police Officers may monitor cameras at the council offices or remotely when exercising the relevant powers granted in law.
14. The CCTV system will be operated 24 hours a day, 365 days of the year.
15. 14. Warning signs, as required by the Code of Practice of the Information Commissioner, will be placed at all access routes to areas covered by the council's CCTV cameras.
16. Recorded images are retained for 30 days, and are then automatically deleted by the system.

System control

17. On a weekly basis, the Town Clerk will check and confirm that:
 - the cameras are functional
 - the equipment is properly recording
 - a record is maintained to confirm inspection
18. Access to the CCTV System will be strictly limited to the Town Clerk and nominated staff delegates, and other authorised persons, such as Police Officers.
19. Unauthorised persons are not permitted to view live or pre-recorded footage. Access to footage is strictly controlled and limited to those with a legitimate need to view it.
20. The CCTV control room at the council offices shall be kept locked at all times when not in use.
21. Unless an immediate response to events is required, cameras may not be re-directed at an individual, their property or a specific group of individuals without an authorisation being obtained from the Town Clerk for Directed Surveillance to take place, as set out in the Regulation of Investigatory Powers Act 2000.

22. If covert surveillance is planned or has taken place, copies of the written authorisation, including any review or cancellation, must be returned to the Town Clerk.
23. Materials or knowledge secured via CCTV will not be used for any commercial purpose.
24. Recorded data will only be used for the stated purposes outlined in this policy.
25. Recorded data will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recorded data will never be released to the media for purposes of entertainment.

Retention and disposal of data

26. All matters of retention are set out in the council's Data Retention policy, published on the council's website.

Dealing with official requests: use of CCTV in relation to criminal investigations

27. CCTV recorded images may be viewed by the police for the prevention and detection of crime, authorised officers and members of the council for legitimate purposes relating to a disciplinary process in line with the Staff Handbook and other relevant published policies of the council, and for authorised demonstration and training purposes.
28. A record will be maintained of the release of data and a register will be available for this purpose.
29. If footage is not released via Digital Asset Management Systems (DAMS) then a completed Access Request form will be required before CCTV can be processed. If the footage is not being processed through DAMS or the council's internal systems then it should only be shared via a memory stick.
30. Requests by the police can only be actioned under the Data Protection Act 2018.
31. As the Data Controller, the council allows the processing of personal data on its behalf by Essex Police (the Data Processor) for policing purposes in accordance with a data sharing agreement with Essex Police and other parties, inter alia, Uttlesford District Council.
32. As the Data Controller, the council will allow access to the public CCTV system to any Essex Police officer for policing purposes as long as it is being used in line with Essex Police internal policy and controls regarding CCTV and in compliance with Data Protection laws.
33. Should footage be required as evidence, a copy may be released to the police under the procedures described in this policy and shall be treated in accordance with all aspects of this policy.

34. The council retains the right to refuse permission for the police to pass to any other person the footage or any part of the information contained therein.
35. Applications received from outside bodies (e.g. solicitors or insurance companies) to view or release disks or memory sticks will be referred to the Town Clerk. In these circumstances, disks or memory sticks will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, or in response to a Court Order. The council may levy a fee in such circumstances, and this fee shall not exceed £25.00.

Complaints

36. Any complaint concerning CCTV or the application of this policy should be made under the council's adopted Complaints Procedure, published on the council's website.

Access by the data subject

37. The UK GDPR and the Data Protection Act 2018 provides Data Subjects (individuals to whom "personal data" relate) with a right to access data held about themselves, including that obtained by CCTV.
38. All such requests should be made in writing to the Town Clerk. Before making a request, you should read the council's Privacy Notice which is published on the council's website and which provides further information with respect to such requests.
39. The council will respond to Subject Access Requests within one month of receipt, as required by the UK GDPR.
40. The council will regularly review and update its CCTV signage to ensure it meets the requirements of the UK GDPR and guidance from the Information Commissioner's Office.

Employee and councillor monitoring policy (via CCTV)

Purpose

This section sets out how the council may use its CCTV system to monitor employees, councillors, and third parties when on council premises. The purpose of such monitoring is to:

- protect the security and integrity of council information and assets
- prevent and detect unauthorised disclosure of information
- deter collusion between staff, councillors, or third parties
- safeguard the council, its officers, and elected members against misconduct
- safeguard the wellbeing, and promote the physical safety, of employees and members

Legal Basis

Monitoring will be carried out in accordance with the Data Protection Act 2018, the UK GDPR, the Human Rights Act 1998, and relevant employment law. The council's legal basis for processing this data is its legitimate interest in maintaining effective governance, protecting information security, preventing misconduct, and safeguarding employees and members.

Scope

Monitoring applies only when employees, councillors, or visitors are on council-owned or controlled premises or grounds (including Foakes House, E.T. Foakes Memorial Hall, and other operational sites). CCTV footage may be reviewed if there are reasonable grounds to suspect a breach of council policy, unauthorised disclosure of information, collusion, or other misconduct. Monitoring will not take place in private areas such as toilets, changing rooms, or designated rest areas.

Principles

The council will ensure monitoring is necessary and proportionate, transparent, targeted, and fair. Monitoring will not be carried out on a continuous basis but only when there is a legitimate cause.

Access and control

Only the Town Clerk (as Data Controller) or the Deputy Town Clerk may authorise access to CCTV footage for the monitoring of employees and members. A record will be kept of all access, including the reason for viewing and the outcome. Any evidence obtained will be handled in line with the council's CCTV Code of Practice.

Data retention

CCTV recordings are normally retained for 30 days. Footage relevant to investigations will be securely retained for as long as necessary and may be shared with legal or investigatory bodies.

Rights of individuals

Employees and councillors have the right to be informed if footage concerning them has been reviewed. Subject Access Requests may be made under Data Protection legislation. Concerns can be raised through the council's Complaints Procedure or Grievance policy.

Review

This policy will be reviewed every 2 years, or sooner if required by changes in law, guidance issued from the Information Commissioner's Office, or council procedures.