2026

Deddington Parish Council

Parish Office
Windmill Centre
Hempton Road
Deddington
Banbury
Oxon OX15 0QH

Tel: 01869 337447

Email: clerk@deddington-pc.gov.uk

Vanessa Oliveri – Clerk to the Council

CCTV POLICY

Amended:	Mary Robinson
Version:	July 2026
Policy adopted:	19 August 2026
Review:	August 2028

Contents

1. Introduction
2. CCTV system overview
3. Purposes of the CCTV system
4. Monitoring and recording
5. Compliance with Data Protection legislation
6. Applications for disclosure of images
7. Retention of images
8. Complaints procedure
9. Monitoring compliance
10. Policy review

1. Introduction

1.1 Deddington Parish Council and Deddington Windmill Community Centre Ltd have in place a CCTV surveillance system. This policy details the purpose, use and management of the CCTV system at the Windmill Community Centre, Hempton Road, Deddington and details the procedures to be followed in order to ensure that the Deddington Parish Council and Deddington Windmill Community Centre Ltd comply with relevant legislation and the current Information Commissioner's Office Code of Practice.

1.2 Deddington Parish Council and Deddington Windmill Community Centre Ltd will have due regard to the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, Deddington Parish Council and Deddington Community Centre Ltd will also have due regard to the Amended Surveillance Code of Practice (updated 3 March 2022) issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles therein (listed at the end of this policy).

1.3 This policy is based upon guidance issued by the Information Commissioner's Office, 'In the picture: A data protection code of practice for surveillance cameras and personal information'.

1.4 This policy and the procedures therein detailed, applies to all of the Deddington Parish Council and Deddington Windmill Community Centre Ltd CCTV systems capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

2. CCTV system overview

2.1 The CCTV system is owned by the Deddington Parish Council, Hempton Road, Deddington, OX15 0QH and managed by the Deddington Parish Council and its appointed agents. Under the Data Protection Act 1998 the Deddington Parish Council is the 'data controller' for the images produced by the CCTV system. The Deddington Parish Council is registered with the Information Commissioner's Office (ICO) and the registration number is Z6706952. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner's Guidance.

2.2 The Chair of Deddington Parish Council is the system controller responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.

2.3 The CCTV system operates throughout the Deddington Windmill Community Centre, the number of cameras in use in 2026 is 21.

2.4 Signs are placed at all pedestrian and vehicular entrances in order to inform staff, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by the Deddington Parish Council and a contact number for the premises is provided.

2.5 The Parish Council is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

2.6 Cameras are sited to ensure that they cover Deddington Windmill Community Centre as far as is possible. Cameras are installed throughout the Deddington Windmill Park including roadways, car parks, buildings, within buildings and externally in vulnerable public-facing areas.

2.7 Cameras are not sited to focus on private residential areas.

2.8 The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

2.9 Any proposed new CCTV installation is subject to a Privacy Impact Assessment.

3. Purposes of the CCTV system

3.1 The purposes of the Deddington Parish Council's CCTV system are as follows:

- for the prevention, reduction, detection and investigation of crime, accidents, and incidents of vandalism or other anti-social behaviour;
- to ensure the safety of staff and members of the public;
- to assist in the investigation of suspected breaches of Deddington Parish Council and Deddington Community Centre regulations and the monitoring and enforcement of traffic related matters.

3.2 The CCTV system will be used to observe the Deddington Windmill Community Centre premises and areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

3.3 The Deddington Parish Council and Deddington Community Centre Ltd seek to operate their CCTV system in a manner that is consistent with respect for the individual's privacy.

4. Monitoring and Recording

4.1 Cameras are monitored by staff within their working hours, and councillors at any time, so they are able to respond to incidents identified on CCTV monitors.

4.2 Images are recorded centrally on servers located on site with secure and controlled access and are viewable by the Chair of the Parish Council (the system controller), the Vice-Chair, the Clerk, our CCTV expert and the chair of the Windmill Management Committee. Additional staff may be authorised by the Deddington Parish Chair to monitor.

4.3 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

4.4 All images recorded by the CCTV system remain the property and copyright of the Deddington Parish Council.

4.5 The monitoring of staff activities will be carried out in accordance with Part 3 of the Employment Practices Code.

5. Compliance with Data Protection Legislation

5.1 In its administration of its CCTV system, Deddington Parish Council complies with the Data Protection Act 1998. Due regard is given to the data protection principles embodied in the Data Protection Act. These principles require that personal data shall be:

a) processed fairly and lawfully;

b) held only for specified purposes and not used or disclosed in any way incompatible with those purposes;

c) adequate, relevant and not excessive;

d) accurate and kept up-to-date;

e) not be kept longer than necessary for the particular purpose;

f) processed in accordance with the rights of individuals;

g) kept secure; and

h) not be transferred outside the European Economic Area unless the recipient country ensures an adequate level of protection.

5.2 Deddington Parish Council will also comply with the General Data Protection Regulation. Due regard will be given to the data protection principles contained within Article 5 of the GDPR which provide that personal data shall be:

a) processed lawfully, fairly and in a transparent manner;

b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;

c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;

d) accurate and, where necessary, kept up-to-date;

e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed;

f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6. Applications for disclosure of images

6.1 The system controller has discretion to refuse any request for information unless there is an overriding legal obligation such as a court order or information access rights. Once they have disclosed an image to another body, such as the police, then the recipient becomes responsible for their copy of that image.

Any access, sharing or processing must comply with Article 6 of the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018. Details of any request should be recorded.

Access to and disclosure of images to third parties

6.2 Where it may be appropriate to disclose images to a third party, for instance in relation to the prevention or detection of crime, such disclosures will be made at the discretion of the Deddington Parish Council, with reference to relevant legislation and the Deddington Parish Council Information Compliance Team (Chair and Vice-Chair of DPC).

6.3 Where a suspicion of misconduct arises and at the formal request of the Investigating Officer, the Deddington Parish Council Chair may provide access to CCTV images for use in staff disciplinary cases.

6.4 A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

Applications by individual data subjects

6.5 Requests by individual data subjects for images relating to themselves "Subject Access Request" should be submitted in writing to the Deddington Parish Council together with proof of identification and, if relevant, the organisation they represent, and a statement explaining why the viewing is requested, bearing in mind the purposes of the surveillance system as specified in Section 3 of this policy.

6.6 In order to locate the images on the Deddington Parish Council's system, sufficient detail must be provided by the data subject to allow the relevant images to be located and the data subject to be identified.

6.7 Where the Deddington Parish Council is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request. Exceptions may be made: (a) if the other individual/s have provided their express consent to the disclosure; (b) if it is reasonable, having regard to the circumstances, to comply without the

consent of the individual/s; or (c) if the other individual/s in the image/s can be blurred or blanked out prior to the viewing by the data subject.

7. Retention of images

7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 21 days (13 cameras on recorder entitled 'DPC Windmill') and 64 days (8 cameras entitled 'Windmill new 2024') from the date of recording. Images will be automatically overwritten after this point.

7.2 Where an image is required to be held in excess of the retention period referred to in 7.1, the Deddington Parish Council Chair, or their nominated deputy, will be responsible for authorising such a request.

7.3 Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.

7.4 Access to retained CCTV images is restricted to the Deddington Parish Council Chair and other persons as required and as authorised by the Deddington Parish Council Chair.

8. Complaints procedure

8.1 Complaints concerning the Deddington Parish Council's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Deddington Parish Council at: Windmill Centre, Hempton Road, Deddington, OX15 0QH.

8.2 All appeals against the decision of the Deddington Parish Council Chair should be made in writing to the Clerk to Deddington Parish Council at: Windmill Centre, Hempton Road, Deddington, OX15 0QH.

9. Monitoring Compliance

9.1 All staff involved in the operation of the Deddington Parish Council's CCTV system will be made aware of this policy and will only be authorised to use the CCTV system in a way that is consistent with the purposes and procedures contained therein.

9.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

10. Policy review

10.1 The Deddington Parish Council's usage of CCTV and the content of this policy shall be reviewed annually by the Deddington Parish Council with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

11. Guiding Principles

System operators should adopt the following 12 guiding principles:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The user of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards.
9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.

10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up-to-date.