



Wilton Town Council

CCTV Policy

Document History	Date	Adopted Date	Minute Ref	Summary of Changes
Original		1/11/2021	228/21 (ii)	
Revision 1		2/4/2024	072/24 (ii)	
Revision 2	24/6/2025	1/7/2025	12	Various updates
Revision 3				

1. Introduction

- 1.1 The purpose of this policy is to regulate the management, operation and use of Wilton Town Council's CCTV System (the System). The aim is to ensure that the System is not abused or misused and that it is correctly and efficiently installed, managed and maintained.
- 1.2 The System comprises of cameras situated at the Sports Pavilion in Castle Meadow, on the corner of South Street and West Street, South Street and North Street. Images are not monitored continuously. The Town Council securely stores images recorded by the System for a limited period. Access to images is restricted to authorised Town Council employees, two nominated Councillors and the Police. With prior written consent of the Police, images may be released to the media via the Police for the purpose of crime detection.
- 1.3 The policy addresses the need for the System to comply with the Data Protection Principles set out in the Data Protection Act 2018, Human Rights Act 1998, Freedom of Information Act 2000, The Investigatory Powers Act 2016 (IPA 2016) (if applicable), Protection of Freedoms Act 2012 and other relevant legislation.
- 1.4 This policy will be subject to review annually, to meet guidelines issued by the Surveillance Camera Commissioner.
- 1.5 Wilton Town Council (The Data Controller) is the System Controller and is responsible for the images recorded by the camera. The Council is responsible for how the System is used and for notifying the Information Commissioner about the System and its purposes. This is a legal requirement of the Data Protection Act 2018.
- 1.6 The Town Clerk is the Town Council's Data Protection Officer.
- 1.7 Ownership of the recorded material and copyright in the recorded material will remain with Wilton Town Council.

2. Objectives of the CCTV System

- To Protect Wilton Town Council property and assets.
- To increase personal safety and help reduce the fear of crime in Wilton
- To support the Police in a bid to deter and detect crime.
- To assist the Police in identifying, apprehending and prosecuting offenders.

3. Viewing of the Recorded/Live Images

- 3.1 Screens displaying images of areas under surveillance will be located so that only authorised employees and councillors of Wilton Town Council or the Police can view the images.

- 3.2 Control of access to the recorded images will be restricted by the Town Clerk or their designate. The Town Clerk, or their designate, will decide whether to allow requests for access by third parties in accordance with the Town Council's Policies.
- 3.3 The viewing of recorded images must take place in a secure area to which the public has no access. Unauthorised persons will not have access to that area whilst a viewing is taking place.
- 3.4 Removal of the medium by Wilton Town Council on which the images are recorded e.g. USB memory stick or password protected email attachment for viewing purposes must be documented as follows.

- Name(s) of officer(s) viewing the images
- The purpose of the viewing
- Date and time of viewing
- Action taken (if any)

Police requests to view images and information relating to the viewing and copying of images at the request of the Police must be recorded in the Police and Public Requests - CCTV Images Viewing Log. The following information must be recorded on the log:

- The reason for the viewing.
- The date and time of removal.
- The name of the person removing the images.
- The name(s) of the person(s) viewing the images. If this includes third parties, this should include the organisation of the third party, e.g. Wiltshire Police.
- The outcome, if any, of the viewing.
- The date and time the images were returned to the System or secure place if they have been retained for evidential purposes.

- 3.5 In some instances, the Police may view images from a location other than the Town Council Offices, e.g. at the Police Station. In these instances, the Police's data protection policies and procedures will apply, and the Police will be the Data Controller for the purposes of complying with the Data Protection Act 2018.
- 3.6 The Police must inform the Town Council in advance if they intend to control the CCTV system from a remote location.

4. Siting of Camera and Signage

- 4.1 The CCTV System will be sited in such a way that it only monitors those areas intended to be covered by the equipment. CCTV software will be used to obscure any private property that falls within the view of the camera.
- 4.2 Where it is not possible to restrict coverage, the owner of the property or space being overlooked will be consulted. If cameras are adjustable by the operator, this should be restricted so that it is not possible to overlook areas not intended to be covered. Camera operators will be trained in recognising the privacy implications in overlooking areas not intended to be covered by the System.

4.3 Signs will be placed so that the public are aware that they are entering a zone that is covered by surveillance equipment. The signs should be clearly visible and legible to members of the public.

4.4 The signs must contain the following information.

- The identity of the organisation responsible for the scheme.
- The Purpose of the scheme.
- Details of whom to contact regarding the scheme.

5. Subject Access Requests

5.1 Under the Data Protection Act, individuals whose images are recorded have a legal right to view the images of themselves, and to be provided with a copy of the images if requested.

They do not have the right of instant access. Access to images must be granted within 30 calendar days of receiving a request and in line with current Wilton Town Council policies.

The Town Clerk is the officer responsible for dealing with requests under the Data Protection Act from members of the public requesting to view images of themselves.

5.2 No fee is payable under normal circumstances. The Town Council may charge a reasonable fee for the administrative costs of complying with a request if it is manifestly unfounded or excessive, or if further copies of personal information are requested.

5.3 A request to view recorded images may also be made under the Freedom of Information Act 2000 (FOI). The Town Council must respond within 20 working days from receipt of a written request for information under the Act. However, if the images are those of the requester, then that information is exempt from the FOI and should be treated as a data protection Subject Access Request as referred to in 5.1 above. If the requested images are of other people who are individually identifiable, these images would not normally be released. This is because the requester could potentially use the images for any purpose, and the individual concerned is unlikely to expect this. This could constitute unfair processing in contravention of the Data Protection Act.

5.4 The applicant must provide sufficient information for the requested images to be identified, i.e. the location, date and approximate time the images are believed to have been recorded.

6. Retention of Images

6.1 Recorded images will be kept for a period of 30 days, after which the recording will be destroyed, unless a longer period is authorised by the Town Clerk. In some circumstances it may be necessary to retain images for longer e.g. at the request of the Police for investigation purposes or to comply with a data subject access request under the Data Protection Act. These images will be destroyed when they are no longer required.

- 6.2 If images are retained for evidential purposes, they must be stored in a secure place to which there is controlled access i.e. the Town Council safe.
- 6.3 If the retained images are released for use in legal proceedings, the following information must be recorded:
- The Name(s) of officer(s) viewing the images
 - The date on which the images were removed from the System for use in legal proceedings.
 - The identity of the organisation responsible for the scheme.
 - The reason they were removed from the System.
 - To whom the images were released e.g. if the images were handed to a police officer, the name and station of that police officer must be recorded and the images signed for by the police officer.
 - Any crime incident number to which the images may be relevant.
 - The location of the images.

7. Complaints

Complaints relating to the use of the CCTV system will be dealt with under Wilton Town Council's complaints procedure.