



**CHIPPENHAM
TOWN COUNCIL**
Improving the quality of town life

CCTV Code of Practice

Chippenham Town Council

FEBRUARY 2025

Contents

1	Change control	3
2	Definitions	4
3	Mission Statement	5
	3.1 Purpose	
	3.2 Checklist	
	3.3 Ongoing review of CCTV	
4	Reasons for use of CCTV	6
5	Monitoring	6 - 7
	5.1 Staffing	
	5.2 Access to CCTV control room	
6	How we will operate CCTV	7 - 8
	6.1 Use of personal data gathered	
	6.2 ANPR	
	6.3 Audit	
	6.4 Camera positions	
7	Retention and erasure	9
	7.1 Storage	
	7.2 Erasure	
	7.3 Requests to object to processing	
8	Use of additional surveillance	9
9	Covert monitoring	10
10	Requests for disclosure	10
	10.1 Sharing with third parties	
	10.2 Subject access requests	
11	Annexe 1 Checklist	12
12	Annexe 2 List of cameras and locations	13 - 18
13	Annexe 3 Data Protection Impact Assessment	19 - 24

1 Change Control

This Code of Practice was created in	January 2024
Council Staff consulted on this document	Corporate Management Team
Renewal data	January 2027
This version is	Version 3.0
It replaces	Version 2.0
It is necessary to comply with	Data Protection Act 2018 General Data Protection Regulation (GDPR) 2016 Human Rights Act (HRA) 1998 Protection of Freedoms Act (PoFA) 2012 Freedom of Information Act (FOI) 2000 Regulation of Investigatory Powers Act (RIPA) 2000 Police and Criminal Evidence Act (PACE) 1984 Other legislation which may be relevant to specific circumstances

2 Definitions

Data Protection Act 2018 (“DPA”)	The law on data protection in the UK
General Data Protection Regulation (“GDPR”)	The law on data protection that came into force on 25 May 2018 throughout Europe
Human Rights Act 1998	The law applies to all public authorities and deals with the right to a fair trial, privacy, degrading treatment and discrimination
Protection of Freedoms Act 2012	This law creates the post of a Surveillance Camera Commissioner, who promotes the surveillance camera code of practice
Regulation of Investigatory Powers Act 2000	This law deals with directed and intrusive surveillance
Police and Criminal Evidence Act 1984	This law deals with statements, collection of admissible evidence and exhibits
Data Controller	A person or organisation that handles and processes personal data and determines the way such data should be processed. For the purpose of this policy Chippenham Town Council are the data controller
Personal Data	Any information from which a living individual can be identified
Sensitive Personal Data	Any Personal Data which includes further information as defined in the DPA. Further information includes (i) racial or ethnic origin; (ii) political opinions; (iii) religious beliefs; (iv) membership of a trade union; (v) physical or mental health or condition; (vi) sexual life or preferences; (vii) information about any criminal offence or court proceedings related to a criminal offence
Information Commissioner’s Office (“ICO”)	The statutory regulator of the DPA and the GDPR
Privacy Notice	A description of Personal Data held by the Council, along with details of purpose, retention and other information about how the Council will handle the Personal Data
Data Subject	As defined in the DPA and the GDPR. The Data Subject is the person who the Personal Data is about, or who is identified by the Personal Data

3 Mission Statement

Chippenham Town Council (“the Council”) is a town council representing the local community, delivering services to meet local needs and improving the quality of town life for all.

To make this happen, the Council has various CCTV cameras installed across the town. The Council recognises that the recording of CCTV images constitutes personal data and will mean it must abide by data protection legislation, such as the DPA and GDPR.

Surveillance cameras can be used to identify people of interest and keep records of people’s activities. The Council recognises that without due process, these cameras can be intrusive and arouse public concern.

The Council believe that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all our staff and visitors. However, the Council recognise that this may raise concerns about the effect on individuals and their privacy. This Code is intended to address such concerns. The Council are committed to complying with our legal obligations and instilling public confidence in our use of Personal Data.

3.1 Purpose

This code of practice explains the principles, purposes, operation and management of CCTV by Chippenham Town Council. The code seeks to provide accountability and reassurance to the public that all this connected with CCTV will comply with the law.

This code is intended to assist staff in complying with their own legal obligations when working with personal data. In certain circumstances, misuse of data generated by CCTV and or other surveillance systems including audible radio transmissions could constitute a criminal offence.

This Policy is intended to ensure that in collecting images through our use of CCTV, the Council recognise the personal data is being collected and will always handle this data correctly and securely and in accordance with the DPA, GDPR and other related legislation. The Council will always ensure that they use such images proportionately and proportionately.

3.2 Checklist

The Council will use the Checklist at Annex 1 for each camera it sites. A record of all completed Checklists will be retained by the CCTV Supervisor.

3.3 Ongoing Review of CCTV

The Council will ensure that the ongoing use of existing CCTV cameras in the town is reviewed every 12 months to ensure that their use remains necessary and appropriate, and that any surveillance system is continuing to address the needs that justified its introduction. The review will be carried out by the CCTV Supervisor.

4 Reasons for Use of CCTV

The Council believe that such use is necessary for legitimate business purposes, including:

- (a) to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime and anti-social behaviour
- (b) for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime.
- (c) to support law enforcement bodies in the prevention, detection and prosecution of crime.
- (d) to assist in day-to-day management, including ensuring the health and safety of staff and others.
- (e) to assist in the effective resolution of disputes which arise during disciplinary or grievance proceedings
- (f) to assist in the defence of any civil litigation, including employment tribunal proceedings
- (g) to assist in the investigation of civil matters, including road traffic incidents.

This list is not exhaustive, and other purposes may become relevant.

5 Monitoring

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

The cameras do not record sound. The ANPR cameras record images and vehicle indexes.

Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

5.1 Staffing

Chippenham Town Council provides in-house staff to provide monitoring services through volunteers. The control centre will only be staffed by trained operators in accordance with council policy and operational procedures.

All staff will be fully conversant with this code and their operational procedure which they will be expected to comply with as far as reasonably practicable at all times.

It will be a condition of appointment that all staff being selected for a role in the control centre satisfactorily complete locally agreed vetting procedures.

Any member of staff or volunteer directly connected to the operation of CCTV will be trained appropriately for their role. The Information Commissioner's Surveillance Code requires all staff to be trained in their responsibilities for data management.

Every individual with any responsibility for CCTV under the terms of this code or related procedures will be subjected to the Council's disciplinary procedures should there be any breach of the code or of any aspect of confidentiality. A breach of the code may also result in criminal proceedings.

5.2 Access to CCTV Control Room

Access is restricted to ensure security and confidentiality of the information inside the control room.

Entry will not be allowed without sufficient reason. Regardless of anyone's status, all access to the control room will be recorded in a visitor's log. All visitors will be reminded of the need for confidentiality. Operational staff will ensure only authorised access and an accurate visitor's log is maintained and enforced.

In the interest of openness and accountability, anyone wishing to visit may be permitted to do so, subject to the approval of the CCTV supervisor. Operators must always be aware of public visits in advance and the visits may be ended for operational reasons at the discretion of the CCTV operator. All public visits will be conducted and recorded in accordance with agreed operational procedures. During all public visits the Police Airwave handset must be turned off.

Access control measures will be used to ensure security and confidentiality of the control room. Authorised personnel will always be present when equipment is in use. If the control room is left unattended for any reason it will be secured.

6 How we will operate CCTV

Wherever CCTV cameras are placed in the town, the Council will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. Data subjects are encouraged to read the Council's data protection pages on its website to find out more about how we use their data. Signage will be checked annually, and a record will be kept of checks of signage and retained by the council.

The Council will ensure that live feeds from cameras, recorded images and data collated from the system are only viewed by approved individuals whose role requires them to have access to such data. This includes police officers and police staff.

6.1 Use of Personal Data gathered

To ensure the protection of individuals' rights recorded by the CCTV system, the Council commits to storing data gathered from CCTV cameras in a manner that upholds its integrity and security. This includes, but is not limited to, the following measures:

- **Data Encryption:** Where feasible, data will be encrypted to prevent unauthorised access and ensure confidentiality.
- **Data Retention Policies:** Data will be retained only for the period necessary to fulfil its intended purpose, in compliance with relevant data protection regulations.
- **Incident Response:** A robust incident response plan will be in place to address any data breaches or security incidents promptly and effectively.

By implementing these measures, the Council aims to safeguard the personal data collected through CCTV systems and uphold the privacy rights of individuals.

6.2 ANPR

Automatic Number Plate Recognition (ANPR) uses specific cameras to capture the registration number of a vehicle as it passes an ANPR camera. The registration number of the vehicle is recorded on the system, but is not connected to the police automatically, although the details are available to the police on receipt of a valid request. All data gathered by the ANPR cameras will be treated in the same way as visual data.

6.3 Audit (Record Keeping) Trail

Records will be kept, either paper-based or electronically on a computer, of all relevant activity associated with the operation and management of any CCTV or surveillance system. This will typically include but is not limited to:

- Access and Visitors - name, times in/out and reasons for visit
- Actions taken by the staff and incidents reported to or seen by them
- Review and disclosure of CCTV images
- Fault reporting and rectification and the regular maintenance programme

All record keeping will be carried out in accordance with local operating procedures. At the control centre, the CCTV management software will enable authorised staff to examine the use of CCTV and records created, to compile reports.

6.4 Camera Positions

If CCTV is the most appropriate means of addressing a pressing need, cameras will be sited in positions to meet that need after preparing an operational requirement document and privacy impact assessment. CCTV must be justified, meet the purpose for which it was installed and recordings must be of an appropriate quality

Cameras will be restricted to ensure they do not view areas that are not of interest and are not intended to be seen, e.g. an individual's private property.

As far as is reasonable, all cameras will be sited in positions that minimise risk to tampering, damage or destruction.

7 Retention and Erasure

7.1 Storage

Data recorded by the CCTV system will be stored digitally. Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough only for incidents to come to light. In all other cases, recorded images will be kept for no longer than 30 days.

We will maintain a comprehensive log of when data is accessed. Copies of data supplied to authorised bodies will be recorded, together with a record of the reasons and the responsibility for the security of the data rests with the body/individual concerned.

7.2 Erasure

At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.

7.3 Requests to Object to Processing

We recognise that, in rare circumstances, individuals may have a legal right to prevent processing likely to cause substantial and unwarranted damage, or to prevent automated decision making. For further information regarding this, please read the Council's Data Protection Policy.

8 Use of Additional Surveillance

Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, the Council will carefully consider if they are appropriate by carrying out a data privacy impact assessment (DPIA).

A DPIA is intended to assist the Council in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

Any DPIA will consider the nature of the problem that the Council are seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, the Council will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in changing rooms).

9 Covert Monitoring

All the Council's cameras are overt, and in plain sight for the public to see. The Council believe this acts as a deterrent to would-be criminals.

The Council will never engage in covert monitoring or surveillance unless the requirements of Regulation of Investigatory Powers Act ("RIPA") have been met and the necessary applications are in place.

The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom.

Only a limited number of named individuals will be involved in any covert monitoring.

Covert monitoring will only be carried out for a limited and reasonable period consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.

The Council will take legal advice on any covert monitoring activities, to ensure it remains compliant with the Regulation of Investigatory Powers Act ("RIPA") and human rights legislation.

10 Requests for Disclosure

10.1 Sharing with Third Parties

The Council may share data with other organisations, for example -

All UK police staff, including non-Home Office Police Forces

Statutory authorities with powers to prosecute e.g. H.M. Revenue and Customs

Solicitors or their legal representatives in criminal or civil proceedings (such a request may incur a fee)

Individuals representing themselves in judicial proceedings

Other agencies (e.g. insurance companies) according to purpose and legal status (such a request may incur a fee)

Where we consider that this is reasonably necessary for any of the legitimate purposes set out above.

Data will not be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.

In other appropriate circumstances, the Council may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

The Council will maintain a record of all disclosures of CCTV footage.

Requests for disclosure should be made via email to dpo@chippenham.gov.uk.

10.2 Subject Access Requests

Data subjects may make a request for disclosure of their personal information, and this may include CCTV images. A Subject Access Request (SAR) is further detailed in the Council's Data Protection Policy.

For the Council to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

The Council reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where the Council consider it necessary to do so.

Annex 1 - Checklist

	Checked (Date)	Date of next review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.		
There is a named individual who is responsible for the operation of the system. Insert name of contact here: <i>Jacqui Gallimore</i>		
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.		
A system has been chosen which produces clear images which the law enforcement bodies can use to investigate crime, and these can easily be taken from the system when required.		
Cameras have been sited so that they provide clear images.		
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.		
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).		
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.		
The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.		
Except for law enforcement bodies, or as part of a legitimate subject access requests, images will not be provided to third parties.		
A DPIA has been approved and the potential impact of CCTV recordings on individuals' privacy has been identified and taken into account in the use of the system.		
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the DPO as soon as such a request is made.		
Regular checks are carried out to ensure that the system is working properly and produces high quality images.		

Annex 2 - Camera list and locations

	Group	System number	Camera name	Type	Address	Signage
1	Town centre	001	Bus station	PTZ	Timber Street	
2	Town centre	002	Bus station	Fixed	Timber Street	
3	Town centre	003	Buckles	Fixed	Timber Street	
4	Town centre	004	Car park		Timber Street	
5	Town centre	005	Rose and Crown	PTZ	Market Place	
6	Town centre	006	War Memorial	Fixed	Market Place	
7	Town centre	007	One Stop	Fixed	Market Place	
8	Town centre	008	Rose and Crown	Fixed	Market Place	
9	Town centre	008.1	Mander Duffill	Fixed	Market Place	
10	Town centre	008.2	Iceland	Fixed	Market Place	
11	Town centre	008.3	Yeld	Fixed	Market Place	
12	Town centre	008.4	St Marys Street	Fixed	Market Place	
13	Town centre	008.5	Iceland Column	Fixed	Market Place	
14	Town centre	009	Betfred PTZ	PTZ	Market Place	
15	Town centre	010	Angel	Fixed	Market Place	
16	Town centre	011	Barclays	Fixed	Market Place	
17	Town centre	012	Bear	Fixed	Market Place	
18	Town centre	013	High Street down	Fixed	Market Place	
19	Town centre	014	Sarah Jaynes	Fixed	Market Place	
20	Town centre	015	Julian House	Fixed	Market Place	
21	Town centre	016	Halifax	Fixed	Market Place	

Gro up	System number	Camera name	Type	Address	Signage	Group
22	Town centre	017	Natwest	PTZ	High Street	
23	Town centre	018	Borough Parade	Fixed	High Street	
24	Town centre	019	Tesco	Fixed	High Street	
25	Town centre	020	Lloyds Bank	Fixed	High Street	
26	Town centre	021	Bridge	PTZ	High Street	
27	Town centre	022	Bridge A	Fixed	High Street	
28	Town centre	023	Roundabout	Fixed	High Street	
29	Town centre	024	Oxfam	Fixed	High Street	
30	Town centre	025	Bike racks	PTZ	High Street	
31	Town centre	026	Station Hill	PTZ	New Road	
32	Town centre	027	Brunel	Fixed	New Road	
33	Town centre	028	Station Hill	Fixed	Station Hill	
34	Town centre	028.1	Station Hill top	Fixed	Station Hill	
35	Town centre	028.2	Cocklebury Road	Fixed	Station Hill	
36	Town centre	028.3	Train station bridge	Fixed	Station Hill	
37	Town centre	028.4	Monkton Hill	Fixed	Station Hill	
38	Town centre	029	Station Hill lights	Fixed	Station Hill	
39	Bath Road CP	030	Bath Road CP	PTZ	Bath Road car park	
40	Bath Road CP	031	Bath Road CP left	Fixed	Bath Road car park	
41	Bath Road CP	032	Bath Road CP centre	Fixed	Bath Road car park	
42	Bath Road CP	033	Bath Road CP right	Fixed	Bath Road car park	
43	Bath Road CP	034	Bath Road CP left	Fixed	Bath Road car park	
44	Town centre	035.1	Bath Road	Fixed	Bath Road	
45	Town centre	035.2	Bridge Centre Gyratory	Fixed	Bath Road	

	Group	System number	Camera name	Type	Address	Signage
46	Town centre	035.3	Bridge Centre Roundabout	Fixed	Bath Road	
47	Town centre	035.4	Avenue La Fleche	Fixed	Bath Road	
48	Town centre	036	New Road	Fixed	Foundry Lane	
49	Town centre	037	New Road A	Fixed	Foundry Lane	
50	Town centre	038	New Road B	Fixed	Foundry Lane	
51	Town centre	039	New Road C	Fixed	Foundry Lane	
52	Town centre	040	Shambles	Fixed	The Shambles	
53	Town Centre		Bath Road	ANPR	Bath Road	
54	Town centre		Rivo	ANPR	High Street	
55	Town centre		Rose and Crown	ANPR	Market Place	
56	M/Park		Monkton Park A	Fixed	Monkton Park	
57	M/Park		Monkton Park B	Fixed	Monkton Park	
58	M/Park		Monkton Park C	Fixed	Monkton Park	
59	M/Park		Monkton Park PTZ	PTZ	Monkton Park	
60	Museum	001	Gallery 1	Fixed	Chippenham Museum	
61	Museum	002	Gallery 2	Fixed	Chippenham Museum	
62	Museum	003	Front gallery 3	Fixed	Chippenham Museum	
63	Museum	004	Rear gallery 3	Fixed	Chippenham Museum	
64	Museum	005	Gallery 4	Fixed	Chippenham Museum	
65	Museum	006	Gallery 5	Fixed	Chippenham Museum	
66	Museum	007	Gallery 6 front	Fixed	Chippenham Museum	
67	Museum	008	Gallery 6 rear	Fixed	Chippenham Museum	
68	Museum	009	Gallery 7 front	Fixed	Chippenham Museum	
69	Museum	010	Camera 7 rear	Fixed	Chippenham Museum	

	Group	System number	Camera name	Type	Address	Signage
70	Museum	011	Gallery 8	Fixed	Chippenham Museum	
71	Museum	012	Gallery 9	Fixed	Chippenham Museum	
72	Museum	013	Gallery 10	Fixed	Chippenham Museum	
73	Museum	014	Gallery 11	Fixed	Chippenham Museum	
74	Museum	015	Entrance	Fixed	Chippenham Museum	
75	Museum	016	Museum rear entrance	Fixed	Chippenham Museum	
76	Town Hall		Finance office	Fixed	Town Hall	
77	Town Hall		Meeting place	Fixed	Town Hall	
78	Town Hall		Meeting place bar	Fixed	Town Hall	
79	Town Hall		Meeting place exterior	Fixed	Town Hall	
80	Town Hall		Neeld bar	Fixed	Town Hall	
81	Town Hall		Neeld hall	Fixed	Town Hall	
82	Town Hall		Neeld side courtyard	Fixed	Town Hall	
83	Town Hall		Reception	Fixed	Town Hall	
84	Town Hall		Reception exit door	Fixed	Town Hall	
85	Town Hall		Side entrance	Fixed	Town Hall	
86	Town Hall		Town hall	Fixed	Town Hall	
87	Town Hall		Town hall bar	Fixed	Town Hall	
88	Stanley Park		3G A	Fixed	Stanley Park	
89	Stanley Park		3G B	Fixed	Stanley Park	
90	Stanley Park		3G C	Fixed	Stanley Park	
91	Stanley Park		3G PTZ	Fixed	Stanley Park	
92	Stanley Park		Car park right	Fixed	Stanley Park	
93	Stanley Park		Car park left	Fixed	Stanley Park	

	Group	System number	Camera name	Type	Address	Signage
94	Stanley Park		Entrance lobby	Fixed	Stanley Park	
95	Stanley Park		Left corridor	Fixed	Stanley Park	
96	Stanley Park		Left side	Fixed	Stanley Park	
97	Stanley Park		Machine shed	Fixed	Stanley Park	
98	Stanley Park		Machine shed external	Fixed	Stanley Park	
99	John Coles Park		Camera 1 A	Fixed	John Coles Park	
100	John Coles Park		Camera 1 B	Fixed	John Coles Park	
101	John Coles Park		Camera 1 C	Fixed	John Coles Park	
102	John Coles Park		Camera 1 PTZ	PTZ	John Coles Park	
103	John Coles Park		Camera 2	Fixed	John Coles Park	
104	John Coles Park		Camera 3	Fixed	John Coles Park	
105	John Coles Park		Camera 4	Fixed	John Coles Park	
106	John Coles Park		Camera 5	Fixed	John Coles Park	
107	John Coles Park		Camera 6	Fixed	John Coles Park	
108	John Coles Park		Camera 7	Fixed	John Coles Park	
109	John Coles Park		Camera 8	Fixed	John Coles Park	
110	John Coles Park		Camera 9	Fixed	John Coles Park	
111	Control room		Intercom	Access control	Museum	
112	Control room		Control room	Fixed	Museum	
113	Control room		Corridor	Fixed	Museum	
114	Control room		Rear door	Fixed	London Road	
115	Cemetery		Cemetery 1	Fixed	London Road	
116	Cemetery		Cemetery 2	Fixed	London Road	
117	Cemetery		Cemetery 3	Fixed	London Road	

118	Cemetery		Cemetery 4	Fixed	London Road	
-----	----------	--	------------	-------	-------------	--

Annex 3 - Data Protection Impact Assessment

Project Information	
Project Name (and or number)	Chippenham Town Council CCTV System
Business Area/s Affected	Chippenham Town Centre, Town Hall, John Coles Park, Stanley Park, London Road Cemetery, Museum, Monkton Park
Senior Responsible Officer	Chief Executive
Information Asset Owner	Chippenham Town Council
Data Protection Officer	One West

Introduction

The Data Protection Impact Assessment (DPIA) process is not only a legal requirement, but also an important tool to identify and minimise the data protection risks of a project that involves processing personal data.

The DPIA enables privacy and data protection considerations to be made in the early stages of a project where any identified problems can be easier to resolve rather than late or retrospective considerations where solutions can be costlier or delay implementation. A DPIA, can also identify whether the project should be continued or revised when balanced with the rights and interests of persons affected.

The DPIA process will consider privacy in the way individual's personal data is used. This can involve privacy about: the integrity of the individual, the person, their personal information, their personal behaviour and their personal communications.

The responsibility for conducting a Data Protection Impact Assessment (DPIA) lies with the Information Asset Owner (IAO) for a project.

The DPIA will require authorisation by -

- Information Asset Owner and Senior Responsible Officer
- Data Protection Officer

Data Protection Impact Assessment Report

1. Outline of the project, objectives and benefits

Objectives -

To implement a comprehensive public space surveillance system that ensures the safety and security of key areas within Chippenham. This system will cover the following locations:

- Centre of Chippenham
- Stanley Park
- John Coles Park
- Chippenham Museum
- Town Hall

Features -

- High-definition cameras strategically placed to monitor all critical areas.
- Real-time video feed to capture live events and activities.
- A well-equipped control room equipped with advanced monitoring technology.
- Capable of viewing both live and recorded footage to ensure continuous surveillance.
- Staffed by trained volunteers to respond promptly to any incidents.

Data Management

- Secure storage of recorded images for future reference and investigation.
- Compliance with data protection regulations to ensure privacy and security.
- Enhanced public safety and crime prevention.
- Increased sense of security for residents and visitors.
- Support Police and statutory partners

2. Whose personal data will you be processing?

Chippenham Town Council will process personal data of persons in public places including the town centre, car parks, parks and residential streets. The data collected and processed is in the form of recorded digital footage. There will be images of children, vulnerable persons, people from minority ethnic groups and religious beliefs however this will not be known at the time of recording unless the cameras are being proactively used by staff.

Any proactive monitoring of the public must be justified by the operator. A full audit trail is maintained and inspected by the system supervisor on a regular basis.

Further processing of personal data will take place when images of individuals are disclosed on request to investigating bodies. Prior to disclosure CTC must be satisfied that the exemptions under the Data Protection Act 2018 Schedule 2 Part 1(Paragraph 2) or the Data Protection Act 2018 Schedule 2 Part 1(Paragraph 5) are met.

3. Who will be making decisions about the uses of the system and which other parties are likely to be involved?

- The CCTV Supervisor is responsible for making day-to-day operational decisions regarding the CCTV system. This includes overseeing the functioning of the system, ensuring compliance with relevant policies, and addressing any issues that arise.
- The post holder (CCTV Supervisor) has the authority to decide whether to withhold or disclose CCTV data. Each decision made regarding data disclosure or withholding must be documented to ensure transparency and accountability.
- The data owner and data controller for the CCTV system is Chippenham Town Council. This means the council is responsible for managing and protecting the data collected by the CCTV system.
- The council will share CCTV data with the following parties:
 1. Data Subjects: Individuals who are the subject of the CCTV footage. They have the right to access data that pertains to them.
 2. Statutory Authorities: Official bodies such as the police or other government agencies that may require access to CCTV data for legal or regulatory purposes.

4. Set out the information flow, from initial capture to eventual destruction.

Data will be captured in video format the system is not capable of recording audio at present. The system is a wireless point to point and 5/6G transmission. There is live monitoring by volunteers and a CCTV Supervisor from the main CCTV control room. Recorded images are retained for 30 days after which they are automatically deleted by the CCTV software and cannot be retrieved.

Footage downloaded to the evidence collection software may be retained for more than 30 days at the discretion of the CCTV supervisor. This footage will be reviewed monthly and deleted as soon as possible.

Footage released to a statutory partner or an individual making a legitimate subject access request is provided on a hard storage device, with no additional copies made. Each piece of footage must be signed for upon collection, and signatories acknowledge that the supplied data becomes their responsibility.

Currently no 'watch lists' are used in the CCTV control room, occasionally images taken from public social media accounts are used to assist in locating missing/wanted persons. These images are disposed of as soon as the individual has been located.

Currently, there are no facial recognition cameras deployed. This means that, at present, no systems are actively using facial recognition technology to monitor or identify individuals in the specified area.

5. What is your lawful basis for using the surveillance camera system?

GDPR Article 6(1)(e) states that processing personal data is lawful if it is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the data controller.

Section 163 of the Criminal Justice and Public Order Act 1994 grants local authorities the power to provide closed-circuit television (CCTV) coverage of any land within their jurisdiction. This is primarily for the purposes of crime prevention and ensuring the welfare of victims.

Section 17 of the Crime and Disorder Act 1998 imposes a duty on local authorities and the police to collaborate in developing and implementing strategies aimed at reducing crime and disorder. This partnership approach is essential for creating effective crime prevention measures and enhancing community safety.

6. How will you inform people that they are under surveillance and ensure that they are provided with relevant information?

The Chippenham Town Council website offers detailed information regarding the locations of surveillance cameras and includes the CTC privacy notice. This ensures transparency and informs the public about the areas under surveillance.

Appropriate signage is installed in and around the areas where surveillance is conducted. These signs serve to notify individuals that they are entering a monitored area, promoting awareness and compliance with privacy regulations.

Additionally, pre-arranged visits to the CCTV Control Room are allowed. This provides an opportunity for interested parties to understand the operations and management of the surveillance system, fostering trust and accountability within the community.

7. How will you ensure that the surveillance is limited to its lawful purposes and the minimum data that is necessary for those purposes?

Operators are trained to understand the relevant legislation that impacts the CCTV system, and the data collected by it. Software will record each activity for each operator, this record will be subject to a regular audit.

Access to the room is restricted to those with a legitimate reason to view the data whether live or recorded. A record of each person accessing the room will be maintained.

Each request for access to the data by a third party will be considered on its own merits and checked against the exemptions provided by the Data Protection Act 2018 Schedule 2 Part 1(Paragraph 2) or the Data Protection Act 2018 Schedule 2 Part 1(Paragraph 5) are met.

A record of each data access request is maintained, from time-to-time Police will be asked to provide an update on the outcome of investigations to ensure that the data gathered is effective in preventing, deterring and detecting crime and anti-social behaviour.

The control room maintains a daily log of all activity to ensure that the data gathered in live view is effective in preventing, deterring and detecting crime and anti-social behaviour.

8. How will you ensure the security and integrity of the data?

Access is restricted to the control room and system; all non-visitors are required to swipe an individual access fob. All visitors are required to complete the visitors' log.

Access to the CCTV is password protected each user has an individual account, the system is subject to regular audits.

The control room and server room are secure, an audible alarm is in use outside of normal business hours. No International transfers are made. All data to third parties is transferred by DVD/CD disc.

9. How will you respond to any subject access requests, the exercise of any other rights of data subjects, complaints or requests for information?

Subject access requests can be submitted via email or in person at the Town Hall. Each request should be submitted using the form available on the Council website. Each request is passed to the CCTV Supervisor to action the request. Where necessary the data is sanitised and is provided in DVD/CD format. Each request is documented, and the document is retained in the control room. Any request through the subject access route will be responded to within one month of the original request.