



CCTV Policy

This Policy should be read with reference to: UK General Data Protection Regulation; Data Protection Act 2018; Freedom of Information Act 2000; Protection of Freedoms Act 2012; Human Rights Act 1998; Data (Use and Access) Act 2025; Information Commissioner's Office CCTV Code of Practice.

Introduction

The processing of personal data captured by CCTV systems including images identifying individuals is governed by legislation including the Data Protection Act 2018 and the Protection of Freedoms Act 2012. The Information Commissioner's Office (ICO) has issued a Code of Practice on compliance with legal obligations to which West Horsley Parish Council also adheres.

West Horsley Parish Council is committed to informing its staff, volunteers and service users about the presence of and operation of CCTV. This Policy is available on the Parish Council's website so that all stakeholders are clear about how CCTV is utilised.

Access to personal information recorded through CCTV cameras is restricted solely to designated persons appointed by West Horsley Parish Council that shall include the Clerk and one or more designated Councillors to access and review CCTV footage where required. Such Councillors shall be recorded in the minutes of the Full Council meeting at which they were designated.

Objectives

West Horsley Parish Council uses CCTV equipment to provide a safer, more secure environment for its staff, volunteers and service users and to combat vandalism and theft. West Horsley Parish Council does not use the CCTV system for covert monitoring. Essentially it is used for:

- The prevention, investigation and detection of crime
- The apprehension and prosecution of offenders (including the use of images as evidence in criminal proceedings)
- Safeguarding members of the public, volunteers and staff
- Monitoring the security of the site
- Protecting private property

Location

Cameras are located in areas where it has been identified there is a need and where other solutions are ineffective. The CCTV system is used solely for the purpose(s) identified and is not used to routinely monitor staff, volunteers, or service users' conduct. Cameras will not be used in areas subject to a heightened expectation of privacy; for example changing rooms or toilets. Signage alerts individuals to the use of CCTV at the entrance to **West Horsley Village Tennis Court**.

Static cameras will not focus on private homes, gardens and other areas of private property. Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.

Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the Police and not for other purposes.

Maintenance

The CCTV system is maintained by West Horsley Parish Council and includes periodic maintenance inspections. The Parish Council is responsible for ensuring that:

- It complies with its responsibilities in relation to guidance on the location of the camera
- The date and time reference are accurate
- Suitable maintenance and servicing is undertaken to ensure that clear images are recorded; where needed this may entail relocation of cameras
- The designated persons are trained in the use of the equipment
- Cameras are protected from vandalism to ensure that they remain in working order

Identification

The Parish Council will ensure that prominent signs are in place and that the signs will:

- Be clearly visible and legible
- Contain details of the organisation operating the scheme, the purpose for using CCTV and who to contact about the scheme
- Be an appropriate size depending on context

Type of Equipment

West Horsley Parish Council's CCTV cameras record visual images only and sound has been muted to ensure compliance with the Code of Practice.

Administration

West Horsley Parish Council is the Data Controller and has responsibility for the control of images and deciding how the CCTV system is used. The Council's Data Audit (Data Protection Impact Assessment) is available to view on the website. Only designated persons will have access to images and they are aware of the procedures that need to be followed when accessing the recorded images. The designated persons will review and be aware of responsibilities under the CCTV Code of Practice and have taken into consideration the ICO's [Checklist for limited CCTV systems | ICO](#). Access to recorded images is restricted to designated persons and recordings will be accessed as prescribed by the Council in the event of an incident. All employees are aware of the restrictions in relation to access and security, and disclosure of, recorded images.

Image Storage, Viewing and Retention

Images will be retained for 30 days unless required for investigation. Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. West Horsley Parish Council reserves the right to use images captured on CCTV where there is activity that cannot be reasonably ignored such as criminal activity, potential gross misconduct, or behaviour which puts others at risk. Where images are retained, the Clerk will ensure the reason for its retention is recorded, where it is kept, any use made of the images and finally when it is destroyed.

Disclosure

Disclosure of the recorded images to third parties can only be authorised by the Data Controller.

Disclosure will only be granted if:

- Its release is fair to all individuals concerned
- There is an overriding legal obligation (e.g. information access rights)
- It is consistent with the purpose for which the system was established.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented. Note that disclosure may be authorised to law enforcement agencies if withholding it would prejudice the prevention or detection of crime. West Horsley Parish Council will pay attention to the Data (Use and Access) Act 2025.

Subject Access Requests

Individuals whose images are recorded have a right to view images of themselves and, unless they agree otherwise, to be provided with a copy of the images. Requests for access should be addressed to the Data Controller.

If West Horsley Parish Council receives a Subject Access Request under the Data Protection Act 2018 it will comply with requests within 1 month. If the request is manifestly unfounded or excessive, or if further copies are requested, the Council may charge a fee.

If the Council receives a request under the Freedom of Information Act 2000 it will comply with requests within 20 working days of receiving the request. However, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request.

Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system.

Refusal to disclose images may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to that individual
- To prevent automated decisions from being taken in relation to that individual.

Monitoring and Evaluation

West Horsley Parish Council undertakes regular reviews of its policies to ensure that the use of CCTV continues to be justified. This would include a review of:

- Its stated purpose
- The location
- The images recorded
- Storage length
- Deletion

Period of Review

The Policy will be reviewed every two years by West Horsley Parish Council.

Guiding Principles of the Surveillance Camera Code of Practice

West Horsley Parish Council follows the 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 use 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.

This policy was adopted by the Council on 17 February 2026.

Next review: February 2028

Checklist

This CCTV system and the images produced by it are controlled by **West Horsley Parish Council** which is responsible for how the system is used under the UK GDPR and Data Protection Act 2018.

We, **West Horsley Parish Council**, have considered the need for using CCTV and have decided it is necessary for the prevention and detection of crime and for protecting the safety of individuals, or the security of premises. We will not use the system for any incompatible purposes and we conduct regular reviews of our use of CCTV to ensure that it is still necessary and proportionate.

Checked (17/02/2026)		Date of next review
<p>We are registered as a data controller with the Information Commissioner’s Office and have submitted a relevant data protection fee to the Information Commissioner’s Office (ICO). We have also recorded the next renewal date.</p>	YES	Renewal Annually in April
<p>There are named individuals who is responsible for the operation of the system.</p>	YES	Annually Annual Meeting in May
<p>Prior to processing we have clearly defined the problem we are trying to address. We regularly review our decision to use a surveillance system.</p>	YES	
<p>We have identified and documented an appropriate lawful basis for using the system, taking into consideration Article(s) 6, 9 and 10 of the UK GDPR and relevant Schedules of the DPA 2018.</p>	YES	ICO currently updating
<p>Our system produces clear images which we can easily disclose to authorised third parties. For example, when law enforcement bodies (usually the police) require access to investigate a crime.</p>	YES	Regular checks
<p>We have positioned cameras in a way to avoid any unintentional capture of private land or individuals not visiting the premises.</p>	YES	
<p>There are visible signs showing that CCTV is in operation. Contact details are displayed on the sign(s) if it is not obvious who is responsible for the system.</p>	YES	Regular checks
<p>We securely store images from this system for a defined period and only a limited number of authorised individuals may have access to them.</p>	YES	
<p>Our organisation will follow the guidance provided by the Information Commissioner’s Office (ICO) when responding to any requests from individuals for copies of their own images or for images to be erased or restricted.</p>	YES	