

MELTHAM TOWN COUNCIL

CCTV CODE OF CONDUCT

Meltham Town Council has adopted this CCTV Code of Conduct following reference to the CCTV Code of Practice as published by the Information Commissioner's Office (ICO) and with reference to the 12 Guiding Principles of the Surveillance Cameras Commissioners (SCC) Code of Practice.

The Self-Assessment Tool provided by the SCC has been completed and will be reviewed on a regular basis.

The Town Council is registered with the ICO under the Data Protection Act 1998 and this registration is renewed annually.

In adopting this code we aim to ensure good practice standards are adopted in operating CCTV.

The need to update the present system.

Prior to the installation of the new system, in May 2015, the Town Council has previously operated CCTV monitoring in the centre of Meltham, (more specifically, four cameras installed on Holmfirth Road looking into to Market Place, on Crossroads Shop looking into the Market Place, at Huddersfield Road looking in to Market Place and at the top of Station Street looking down towards Morrisons). Over the years, these cameras and the supporting hardware, (VHS video recorder at each location and VHS video tapes), have become increasing out of date and the data supplied in support of evidence for crimes has been of very little use. By updating the hardware and changing the location of the cameras, (to concentrate on the centre of Market Place covering all the roads entering the Market Place, (namely Station Street, Huddersfield Road, Holmfirth Road and Wessenden Head Road), the Town Council hope to provide a system which is fit-for-purpose and provides reassurance to residents and businesses. It should be noted that CCTV in nearby villages and town centres, Honley, Holmfirth and Huddersfield is provided and monitored by Kirklees Council. Meltham Town Council is aiming to provide a similar level of support to residents and businesses.

On regular occasions, the Town Council is contacted by the Police regarding various incidents in the village; these range from assaults, burglary, theft, vandalism and road traffic accidents. The Police Officers attended the Town Council offices and ask for evidence from the CCTV tapes to identify offenders, assess the incidents, (particularly with road traffic accidents), and use the information as evidence to prosecute offenders. The Town Council has also been contacted by business owners, (following incidents of theft and vandalism), and by local residents, (following road traffic accidents and assaults). By updating the present system, the Town Council feel that they will be able to provide proper information to the Police as opposed to sub-standard information which has previously been available. Information will only be given to the Police, but the presence of an updated system should provide businesses and residents with reassurance that any offences in the centre of the village will be recorded and made available to the Law Enforcement Authorities.

Privacy Impact Assessment (PIA) - Although conducting a PIA is not a legal requirement of the Data Protection Act or the Information Commissioners Office, Meltham Town Council have undertaken this assessment in the spirit of transparency and good practice.

The Town Council has notified residents of its intentions to update the CCTV equipment and asked for feedback in the Council's Newsletter – Meltham Mercury. All discussion and

decisions relating to CCTV provision in the village is include within the Council's minutes which are published on the Town Council's website – www.melthamtowncouncil.gov.uk and are available for inspection at the Town Hall.

As the Town Council is updating previously installed equipment, no privacy issues are expected as none have been raised previously. Consultation has been carried out by way of articles in Meltham Mercury and only one privacy issue has been raised but in the main, feedback has been positive. The Town Council will continue to report back to residents on the CCTV system in place, (after receiving monthly reports from System Vision Ltd on the number and type of incidents recorded). Cameras will be installed in such a way as to ensure that the privacy of residents in their private property is not infringed. Should a complaint arise, the Town Council will notify System Vision Ltd as soon as possible in order that remedial action can be taken and reassurances given.

It should be noted that the cameras will not be monitored real-time and will not be directed towards areas in which they will infringe on private property or individual privacy. The Town Council wished to ensure that privacy issues are not encountered and will endeavour to work with any complainants to ensure that they are satisfied that this is the case. The installation of CCTV is purely to act as a deterrent against crime and anti-social behaviour and provide evidence should such incidents occur.

Installation of CCTV from May 2015 onwards

Installation and maintenance - The CCTV equipment will be installed and maintained by System Vision Ltd, Millfields House, Huddersfield Road, Holmfirth, HD9 3JL.

PIA for each camera - System Vision will provide individual privacy impact assessments reports for each camera, (16 in total) and also a snapshot of the view of the camera. Subject to approval of the Town Council, System Vision Ltd will conduct face-to-face meetings with all householders whose property falls into the vision of the cameras to ensure that they are happy with recording to take place. If they are not, then the area in question will be indelible blanked and they will be made aware that if a crime takes place then no images will be recorded.

Data controller - All data will be controlled by System Vision Ltd.

The collection of data – the equipment installed by System Vision Ltd will collect data from 16 cameras installed around the centre of the village of Meltham. The cameras will be positioned on Holmfirth Road, Huddersfield Road, Station Street and Market Place, Meltham. Please refer to the map and key for exact locations.

Notification of the CCTV system – CCTV warning signs will be displayed on all roads which have CCTV and these will give the name of the installer and data controller – System Vision Ltd.

The use of the data – this will be carefully monitored by System Visions Ltd's authorised personnel. Only authorised personnel, (currently four members of staff), will be permitted to view any recorded footage.

Daily checks will be undertaken to ensure that the system is working correctly but no data from these checks will be retained, (unless a crime has been committed at the time of the check).

Data and images will not be downloaded unless a request is made by the Police. Data will only be supplied to the Police for specific reasons; these being:
- prevention of crime and evidential support

- public safety and enforcement and
- traffic management.

Data and images will not be passed to any other person, other than the Police, (it should be noted that even officers and members of Meltham Town Council will not be allowed to view or take images from the system).

Data images will be held 'locally' in the image processing unit for 28 days and will then be overwritten.

Should a request be made from the Police, then System Vision Ltd will provide either an Information Pack or an Evidence Pack using procedures agreed with the Police under the PACE guidelines.

In the event of a criminal prosecution or at the request of the Police, images used as evidence will be retained until completion of the case. In cases such as this, images will be stored securely at the offices of System Vision Ltd.

Complaints and enquiries should be addressed to:

The Clerk to the Council
Meltham Town Council
Town Hall
Meltham HD9 4AG or e-mailed to melthamcouncil@btconnect.com

The Clerk will acknowledge receipt of the complaint within seven working days and explain how the complaint will be handled, providing timescales. The Clerk may have to contact and consult with System Vision to obtain all necessary information.

Subject Access Requests will be provided with 40 calendar days to individuals who wish to view images of themselves. A charge of £10 will be made for such requests – payment to be made to System Vision Ltd on application of the request. A person who requires this information must provide details to allow proper identification of themselves and also sufficient information to locate the images together with the purposes as to why they require the images. The images of third parties may need to be obscured before releases this information.

Freedom of Information requests to release images of individuals to third parties are exempt as these images come under the Data Protection Principles (see details in the full Code of Practice as issued by the ICO).

Adopted by the Town Council at the Council Meeting on Monday 14 September 2015.

Signed by Cllr Paul White
Town Mayor of Meltham Town Council 14/09/15