

## **CCTV Policy for Milcombe Parish Council – Play Area, Bloxham Road, Milcombe**

### **1. Purpose of CCTV**

Milcombe Parish Council operates CCTV in the children's play area to support **public safety, safeguarding, and crime prevention**. The system is used to:

- Promote the safety and wellbeing of children, parents, and carers.
- Deter vandalism, anti-social behaviour, and damage to play equipment.
- Assist in the investigation of incidents, including safeguarding concerns.
- Protect parish-owned property and reassure the local community.

### **2. Legal Basis and Compliance**

Operation of the CCTV system complies with:

- **UK GDPR** and the **Data Protection Act 2018** for lawful, fair, and transparent processing.
- **Protection of Freedoms Act 2012**, requiring surveillance to be necessary and proportionate.
- **ICO CCTV Code of Practice**, covering signage, retention, access, and governance.
- Safeguarding expectations for environments used by children, ensuring minimal intrusion and clear justification.

Milcombe Parish Council acts as the **Data Controller**.

### **3. System Description**

- Cameras cover the **play area and its immediate surroundings only**.
- Cameras are **fixed-position** and do **not** record audio.
- No cameras are placed in areas where privacy is expected (e.g., toilets or changing areas).
- The system records continuously and stores footage securely.

### **4. Signage and Public Awareness**

Clear signs are displayed at all entrances to the play area stating:

- That CCTV is in operation.
- The purpose of monitoring (safety and crime prevention).
- Contact details for Milcombe Parish Council as the Data Controller.

### **5. Data Controller Contact Details**

**Milcombe Parish Council**, 3 Tanners Close, Middleton Cheney, Banbury, OX17 2GD.

e: [clerk@milcomebparishcouncil.gov.uk](mailto:clerk@milcomebparishcouncil.gov.uk) t: 01295 710965

The Council is responsible for ensuring compliance with data protection law and responding to data-related requests.

## 6. Data Storage and Retention

- Footage is stored securely with access restricted to authorised personnel.
- Footage is retained for **no longer than necessary**, typically **28–31 days**, unless required for an active investigation.
- Footage is automatically deleted after the retention period.

## 7. Access to Footage

Access is strictly limited to:

- Authorised Milcombe Parish Council personnel, namely the Clerk and Chairman
- Police or safeguarding authorities with a lawful request.
- Individuals requesting footage of themselves, subject to redaction and legal exemptions.

All requests must be made in writing to the Data Controller.

## 8. Safeguarding Considerations

- CCTV is **not used to monitor children's behaviour** or staff/parent interactions.
- Footage involving children is treated as **sensitive personal data** and handled with enhanced security.
- Any safeguarding concerns identified in footage are reported in line with the Council's safeguarding procedures.

## 9. System Management and Security

- Equipment is maintained to ensure clear images and reliable operation.
- Footage is encrypted and stored on secure systems.
- Access logs are kept to record who has viewed or downloaded footage.

## 10. Review and Accountability

- The policy is reviewed **annually** or following any significant incident or system change.
- The Council regularly assesses whether CCTV remains necessary, proportionate, and effective.
- Any changes to camera placement or purpose require an updated Data Protection Impact Assessment (DPIA).

## 11. Data Protection Impact Assessment (DPIA)

Milcombe Parish Council has completed a DPIA to:

- Assess risks to children and adults using the play area.
- Ensure CCTV is the least intrusive method of achieving safety objectives.
- Document safeguards and mitigation measures.

## **12. Complaints and Concerns**

Concerns about CCTV use can be raised with Milcombe Parish Council using the contact details above. Complaints will be managed under the Council's formal complaints procedure.

12 May 2026