

ASHINGTON TOWN COUNCIL CCTV POLICY

Contents

1. Introduction	2
2. Objectives	2
3. Legal Framework.....	2
Data Protection Act 2018 (DPA 2018) & UK General Data Protection Regulation (UK GDPR): ...	2
Surveillance Camera Code of Practice	2
Human Rights Act 1998.....	2
Freedom of Information Act 2000	2
Regulation of Investigatory Powers Act 2000 (RIPA):	2
Protection of Freedoms Act 2012	2
4. Governance and Accountability	3
4.1 Roles and Responsibilities	3
4.2 Oversight Committee	3
4.3 Documentation and Records.....	3
5. Operation and Management.....	4
6. Subject Access Requests.....	5
7. Sharing Crime Prevention Stories	5
8. Training and Awareness.....	6
9. Contractor Management.....	6
10. Monitoring and Review	6
11. Complaints	6
12. Contact Information	7

This CCTV Policy was adopted by the council at its meeting held on 26th May 2026. **Reviewed and updated May 2026 to reflect the Data (Use and Access) Act 2025.**

ASHINGTON TOWN COUNCIL CCTV POLICY

1. Introduction

Ashington Town Council operates a Closed-Circuit Television (CCTV) system to enhance the safety and security of its residents, staff, and visitors, and to assist in the detection and prevention of crime. This policy outlines the legal framework, operation, and governance of the Council's CCTV system, which is managed by a third-party contractor, Asset Watch Ltd.

2. Objectives

- To enhance public safety by deterring and detecting crime.
- To protect Council property and assets.
- To support law enforcement authorities in investigating incidents.
- To ensure compliance with applicable laws and safeguard the privacy of individuals.
- To provide transparency in the Council's use of surveillance technology.

3. Legal Framework

Ashington Town Council's CCTV system operates in full compliance with the following UK laws and regulations:

Data Protection Act 2018 (DPA 2018) & UK General Data Protection Regulation (UK GDPR):

The Council is committed to processing personal data captured by CCTV in a lawful, fair, and transparent manner. CCTV footage will only be used for specific purposes, including the prevention of crime, public safety, and supporting law enforcement. The Council maintains appropriate documentation, including Data Protection Impact Assessments (DPIAs) for its CCTV operations.

Surveillance Camera Code of Practice: Issued under the Protection of Freedoms Act 2012, the Council adheres to this Code to ensure that the use of CCTV is proportionate, necessary, and transparent. The Council follows the 12 guiding principles set forth in the Code.

Human Rights Act 1998: The Council ensures that the use of CCTV respects the rights to privacy under Article 8 of the European Convention on Human Rights. CCTV monitoring is carried out in a way that minimally interferes with individuals' privacy.

Freedom of Information Act 2000: Members of the public have the right to request information, including CCTV footage, under the Act. All requests will be handled in accordance with the law, with due consideration for data protection requirements.

Regulation of Investigatory Powers Act 2000 (RIPA): The Council ensures that any covert surveillance complies with RIPA where applicable, obtaining necessary authorizations before undertaking directed surveillance.

Protection of Freedoms Act 2012: The Council adheres to the provisions related to surveillance camera systems.

Data (Use and Access) Act 2025 (DUAA 2025): This Act received Royal Assent on 19 June 2025 and amends the UK GDPR and Data Protection Act 2018 in several ways directly relevant to CCTV operations. Key changes include: (i) a "stop the clock" mechanism for Subject Access Requests, allowing the one-month response period to be paused while awaiting clarifying information from the requester such as date, time, or camera location; (ii) a "reasonable and

ASHINGTON TOWN COUNCIL CCTV POLICY

proportionate” search standard for SARs, meaning the Council is not required to expend disproportionate effort retrieving footage from extensive timeframes or multiple locations where this would be unreasonable; (iii) a new statutory right for individuals to complain directly to the Council as data controller (in addition to their existing right to complain to the Information Commission), which must be supported by a documented complaints process — in force from 19 June 2026; and (iv) the renaming of the Information Commissioner’s Office as the Information Commission. The Council’s CCTV operations comply with this Act as it supplements the existing data protection framework.

4. Governance and Accountability

4.1 Roles and Responsibilities

Data Controller: Ashington Town Council is the data controller for all personal data processed through its CCTV system.

Senior Responsible Officer (SRO): The Executive Officer of the Council acts as the SRO for CCTV operations, with overall accountability for compliance with this policy and relevant legislation.

Data Processor: Asset Watch Ltd acts as a data processor on behalf of the Council and must comply with all contractual obligations and data protection requirements.

Designated Point of Contact (DPOC): A designated staff member within the Council who manages day-to-day CCTV matters, communications with Asset Watch Ltd, and handles public inquiries.

4.2 Oversight Committee

A CCTV Liaison Committee consisting of:

- The Executive Officer
- At least three elected members of the Town Council
- A representative from Asset Watch Ltd (when required)
- A representative from Northumbria Police (when required)

This committee will meet quarterly to:

- Review the operation of the CCTV system
- Assess compliance with this policy and relevant legislation
- Consider any complaints or requests related to CCTV
- Make recommendations for improvements to the system
- Review and approve any proposed changes to camera locations or capabilities

4.3 Documentation and Records

The Council will maintain:

- A map showing the location of all cameras

ASHINGTON TOWN COUNCIL CCTV POLICY

- Records of all access to and sharing of CCTV footage
- Data Protection Impact Assessments for the CCTV system
- Regular audit reports on system compliance and effectiveness via scheduled meetings

5. Operation and Management

The operation, surveillance, playback, and sharing of CCTV footage are managed by **Asset Watch Ltd**, a contractor appointed by Ashington Town Council.

The responsibilities of Asset Watch Ltd include:

Camera Operation: Installing and maintaining CCTV cameras in key locations identified by the Council for crime prevention and public safety. Cameras are clearly visible and signposted with appropriate notices that identify:

- The purpose of the surveillance
- The data controller (Ashington Town Council)
- Contact information for inquiries

Footage Access: Controlling access to recorded footage and ensuring only authorised personnel view or handle the footage. A log must be maintained recording:

- Date and time of access
- Identity of the individual accessing the footage
- Reason for access
- Footage viewed
- Any copies made or footage shared

Footage may be shared with law enforcement agencies, NCC Community Safety Team, NCC Environmental Enforcement, and any Local Authority body when necessary, subject to appropriate documentation.

Playback and Retention: Ensuring recorded footage is retained for a maximum of 30 days, unless needed for ongoing investigations. After this period, the data will be securely deleted through automated processes.

Data Security: Protecting recorded footage from unauthorised access, loss, or damage. Asset Watch Ltd will ensure the system is regularly reviewed for security and compliance, implementing:

- Secure access controls (passwords, encryption where appropriate)
- Audit trails of system access
- Regular security testing
- Secure transmission methods when sharing footage

ASHINGTON TOWN COUNCIL CCTV POLICY

System Maintenance: Regular maintenance to ensure all equipment remains functional and secure, with a documented maintenance schedule and prompt resolution of any faults.

6. Subject Access Requests

Individuals have the right to request access to their personal data captured by the CCTV system under the UK GDPR and Data Protection Act 2018. These rights are supplemented by the Data (Use and Access) Act 2025. The Council will:

- Process requests within one month of receipt. Under the Data (Use and Access) Act 2025, this period may be paused (“stop the clock”) while the Council seeks clarifying information from the requester, for example the date, time, or camera location relevant to their request. Any pause must be documented and the requester informed promptly
- Verify the identity of the requestor
- Take steps to prevent disclosure of third-party personal data where possible
- Provide footage in an appropriate format
- Document all requests and responses
- Conduct a reasonable and proportionate search when locating relevant footage. Under the Data (Use and Access) Act 2025, the Council is not required to expend disproportionate effort retrieving footage across extensive timeframes or multiple camera locations. Where a request is insufficiently specific to allow a targeted search, the Council will contact the requester for clarification before commencing the search

Requests should be made in writing to the Council, providing sufficient information to locate the relevant footage, including date, time, and location.

7. Sharing Crime Prevention Stories

Ashington Town Council recognises the positive impact that CCTV can have on public safety and community confidence. When CCTV contributes to crime prevention or detection, the Council may share stories of successful interventions, in collaboration with Asset Watch Ltd, while adhering to all legal requirements. The following principles will guide this process:

Anonymisation: Stories will be shared in a way that protects the identity of individuals, unless legal authorities permit otherwise. Personal data will not be disclosed without explicit consent or a legal basis.

Collaboration with Authorities: The sharing of crime prevention stories will be done in close cooperation with law enforcement agencies, ensuring the correct balance between transparency and confidentiality.

Public Communication: Stories highlighting the success of CCTV in preventing or solving crime may be shared through Ashington Town Council's communication platforms, including newsletters, social media, and press releases, ensuring full compliance with data protection regulations.

Approval Process: All stories must be reviewed and approved by the SRO before publication to ensure compliance with legal and ethical standards.

ASHINGTON TOWN COUNCIL CCTV POLICY

8. Training and Awareness

All Council staff and members who may access or be involved with the CCTV system will receive appropriate training, including:

- Data protection and privacy awareness
- Operation of the CCTV system (for authorized users)
- Security procedures and protocols
- Handling of subject access requests
- Incident reporting procedures

Training will be refreshed annually, and records of all training will be maintained.

9. Contractor Management

The relationship with Asset Watch Ltd is governed by a formal contract that:

- Clearly defines roles and responsibilities
- Specifies data protection obligations
- Sets out performance standards and service levels
- Includes provisions for regular reporting and review
- Contains appropriate security requirements
- Establishes breach notification procedures

The contract is reviewed annually to ensure it remains fit for purpose and compliant with current legislation.

10. Monitoring and Review

This policy will be reviewed annually to ensure ongoing compliance with UK laws and any changes in legislation. Regular audits of the CCTV system will be conducted to evaluate its effectiveness and adherence to this policy. This includes:

- Quarterly meetings with Asset Watch Ltd and Northumbria Police, and key stakeholders
- Annual internal audit of policy compliance
- Biennial independent audit of the entire CCTV system
- Regular testing of security measures

Updates to the policy must be approved by the full Council before implementation.

11. Complaints

Any complaints or concerns regarding the Council's CCTV system can be directed to the Executive Officer. Complaints will be:

- Acknowledged within five working days

ASHINGTON TOWN COUNCIL CCTV POLICY

- Investigated thoroughly
- Responded to within 20 working days
- Recorded and reported to the CCTV Oversight Committee

Complaints will be handled in accordance with the Council's complaints procedure, and individuals have the right to escalate any concerns to the Information Commission (formerly the ICO, renamed under the Data (Use and Access) Act 2025). Under the Data (Use and Access) Act 2025, individuals also have the right to complain directly to the Council as data controller about how their personal data has been processed, including through the CCTV system. This right is in addition to the right to complain to the Information Commission. The Council will handle all such complaints through its documented complaints process and will provide a substantive response within 20 working days.

12. Contact Information

For any queries regarding this policy or to request access to CCTV footage, please contact:

Ashington Town Council

Telephone: (01670) 624521

Email: admin@ashingtontowncouncil.gov.uk

Website: www.ashingtontowncouncil.gov.uk