



Wixams Town Council CCTV and ANPR Policy (Enhanced Governance Version)

1. Policy Statement

Wixams Town Council operates Closed-Circuit Television (CCTV) and Automatic Number Plate Recognition (ANPR) systems within Wixams Town to support community safety, prevent and detect crime, and protect public property.

These systems process personal data including identifiable individuals and vehicle registration numbers. The systems involve systematic monitoring of publicly accessible spaces on a continuous basis and therefore require a full Data Protection Impact Assessment (DPIA).

The Council operates the systems in accordance with UK GDPR, the Data Protection Act 2018, the Protection of Freedoms Act 2012 and the Surveillance Camera Code of Practice.

2. Data Controller

Data Controller: Wixams Town Council

Contact Email: clerk@wixams-pc.gov.uk

The Council's appointed Data Protection Officer (DPO) is the Town Clerk who can be contacted via the council website and the above email address.

3. Purpose of the Surveillance System

- Prevention and deterrence of crime and anti-social behaviour
- Detection and investigation of incidents
- Public safety protection
- Protection of council property
- Provision of evidential material to law enforcement

4. System Locations

- The Causeway – CCTV and ANPR
- Bedford Road (outside Wixams Retirement Village) – CCTV and ANPR
- Southern Cross – CCTV and ANPR
- Cedarwood Circle – CCTV and ANPR
- Meadow Road – CCTV and ANPR
- Lakeview Village Hall – CCTV only

5. Lawful Basis

Article 6(1)(e) UK GDPR – Public Task.

Processing is necessary for community safety, crime prevention and protection of public property.

6. Data Collected

- Images of identifiable individuals
- Vehicle registration numbers (ANPR)
- Images of vehicles
- Date, time and location metadata

7. Retention

Footage is normally retained for 28–31 days unless required for evidential or investigative purposes.

8. Governance

The Town Clerk is responsible for oversight of the CCTV system including compliance, access control, disclosure logging and policy review.

Appendix A – Data Protection Impact Assessment (DPIA)

The CCTV and ANPR systems process personal data including images of identifiable individuals and vehicle registration numbers.

The system constitutes systematic monitoring of public spaces on a large scale. Risks include unauthorised access, misuse of footage and privacy intrusion.

Mitigation measures include restricted access, secure storage, staff training, clear retention policies and oversight by the Town Clerk as the Data Protection Officer.

Appendix B – CCTV Access Log Template

Date	Officer Name	Reason for Access	Footage Location/Camera	Exported (Yes/No)	Authorised By
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Appendix C – Police / Law Enforcement Footage Request Form

Requesting Organisation: _____

Officer Name and Badge Number: _____

Contact Details: _____

Incident Reference Number: _____

Date and Time of Incident: _____

Location of Incident: _____

Footage Requested (camera/location): _____

Legal Basis for Request: _____

Authorising Council Officer: _____

Date Footage Provided: _____

Appendix D – CCTV Subject Access Request (SAR) Form

Full Name: _____

Address: _____

Email / Phone: _____

Proof of Identity Provided (type): _____

Date and Time of Footage Requested: _____

Location of Incident: _____

Description of Individual in Footage: _____

Reason for Request: _____

Signature: _____

Date: _____

Appendix E – CCTV Disclosure Register

Date	Organisation Requesting Footage	Reason for Disclosure	Footage Reference	Authorising Officer	Notes
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Appendix F – CCTV Operational Use Protocol

This protocol defines how Wixams Town Council's CCTV and ANPR systems must be used in practice to ensure compliance with UK GDPR, the Data Protection Act 2018 and the Surveillance Camera Code of Practice.

Authorised Users

Access to live or recorded footage is restricted to authorised personnel approved by the Town Clerk. Authorised users must complete data protection and CCTV handling training before being granted system access.

Viewing Live Feeds

Live feeds may only be viewed where necessary for operational reasons such as monitoring an active incident, supporting public safety, or assisting law enforcement. Casual or curiosity viewing of cameras is strictly prohibited.

Accessing Recorded Footage

Recorded footage may only be accessed for legitimate purposes including incident investigation, responding to police requests, responding to complaints, or fulfilling a lawful data request.

Exporting Footage

Footage may only be exported where necessary for evidential purposes. Any export must be logged in the CCTV Access Log and authorised by the Town Clerk or a delegated officer.

Chain of Custody

When footage is exported for evidential use, the following must be recorded: date of export, officer exporting footage, reason for export, recipient organisation, and storage medium used. This ensures evidential integrity.

Prohibited Uses

The CCTV and ANPR systems must not be used for: monitoring individuals without legitimate cause, personal curiosity, employee surveillance without legal basis, behavioural profiling, or automated decision making.

Audit and Monitoring

System access logs and disclosure registers will be reviewed periodically by the Town Clerk to ensure compliance with this protocol and to detect any inappropriate access.

Appendix G – Surveillance Camera Code of Practice: 12 Principles Compliance Table

Surveillance Camera Principle	How Wixams Town Council Complies
1. Use must be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.	CCTV and ANPR systems are deployed for crime prevention, public safety, and protection of council assets as defined in the policy.
2. The use must take into account its effect on individuals and their privacy.	A Data Protection Impact Assessment has been completed and privacy impacts assessed and mitigated.
3. Transparency with the public about surveillance use.	Clear signage is installed before entry to monitored areas and the policy is publicly available.
4. Clear responsibility and accountability for all surveillance activities.	The Town Clerk has operational oversight and governance responsibility for the system.
5. Clear rules, policies and procedures must be in place.	This document and associated appendices provide operational protocols, access logs and disclosure procedures.
6. No more images and information should be stored than strictly required.	Retention periods are limited to 28–31 days unless required for evidential purposes.
7. Access to retained images and information should be restricted.	System access is limited to authorised personnel and all access is logged.
8. Disclosure of images and information must be controlled.	All disclosures are recorded in the CCTV Disclosure Register and must have a lawful basis.
9. Surveillance system operators must consider operational competence.	Authorised users receive appropriate data protection and CCTV system training.
10. Systems must be subject to appropriate	Technical and organisational security controls are implemented including

security measures.

password protection and secure storage.

11. Surveillance systems should be reviewed regularly.

The CCTV policy and operation are reviewed annually or earlier where required.

12. Use of surveillance technology must comply with relevant legal obligations.

The system operates in compliance with UK GDPR, Data Protection Act 2018 and the Protection of Freedoms Act 2012.

--- Governance Clarifications and Amendments (Adopted by Council Resolution) ---

Statutory Authority

In addition to Article 6(1)(e) UK GDPR (Public Task), the Council relies on statutory powers and duties as a local authority to promote community safety and protect public assets. These include powers under the Local Government Act 1972, the Local Government Act 2000, and the Crime and Disorder Act 1998. The deployment of CCTV and ANPR systems forms part of the Council's exercise of these functions in support of crime prevention, public safety and the protection of community property.

Authority for Camera Placement

Cameras are installed either on land owned or controlled by the Council or on land where permission has been granted by the relevant landowner or public authority. Where cameras overlook highways or areas outside direct Council ownership, installation and operation take place with appropriate permissions or partnership arrangements with the relevant authority.

A register of camera locations and installation authorities is maintained by the Council and may be made available for inspection upon reasonable request.

Periodic Review of CCTV System

The Council will periodically review the operation, necessity and proportionality of the CCTV system. Reviews will consider effectiveness in meeting public safety objectives, public feedback, complaints received, technological developments and whether continued deployment at each location remains justified.

Transparency and Public Information

Information regarding the Council's CCTV system, including its purpose, lawful basis, data protection rights and contact details for the data controller, will be made publicly available through council publications and the council website.

--- Additional Governance Clarifications Adopted by Council ---

Data Protection Officer Independence

The Town Clerk acts as the Council's appointed Data Protection Officer (DPO). The Clerk does not operate the CCTV system, supervise staff responsible for its operation, or make operational decisions regarding footage access or disclosure. Operational oversight, authorisation of access, and disclosure decisions are determined collectively by the Full Council in accordance with the Council's governance procedures. This arrangement is intended to ensure that the DPO role can provide independent advice and oversight in accordance with UK GDPR requirements.

ANPR Operational Limitations

The Council's ANPR capability is limited strictly to the capture of vehicle registration numbers where vehicles pass within the camera field of view. The system is not used to track vehicle movements, create behavioural profiles, generate automated alerts, or conduct pattern analysis. The system is not connected to, nor integrated with, any police or external law-enforcement databases. Any disclosure of relevant footage or registration data to law enforcement occurs only in response to lawful requests.

CCTV Signage Requirements

Clear signage will be displayed at entrances to monitored areas and in visible positions within the surveillance zone. Signage will include:

- a statement that CCTV / ANPR recording is in operation
- the purpose of the surveillance (crime prevention and public safety)
- the identity of the data controller (Wixams Town Council)
- contact details for further information or data protection enquiries.

Authority for Installation on Third-Party Land or Highway Infrastructure

Where CCTV or ANPR equipment is installed on, attached to, or overlooking land or infrastructure not owned or directly controlled by Wixams Town Council, appropriate permission or agreement is obtained from the relevant landowner or authority prior to installation and operation. The Council maintains records of these permissions as part of its CCTV governance documentation.

Specific Installation Authorities

- Meadow Road – Permission granted by Urban & Civic on 23 February 2026. The land is expected to transfer into Wixams Town Council jurisdiction once the site is formally adopted.
- Cedarwood Circle – Permission granted by Houghton Conquest Parish Council at its July 2024 meeting (reference 15:07/24(d)).
- All remaining camera locations are situated within the jurisdiction of Wixams Town Council.

Targeted Use of Surveillance

The Council's CCTV and ANPR systems are deployed in a targeted manner at specific locations where there are identifiable public safety or crime prevention objectives. The system is not designed or operated for mass surveillance of the population. Camera coverage is limited to areas necessary to achieve the stated purposes and is subject to governance, access controls, and periodic review.

Evidence-Based Deployment

The deployment and retention of CCTV and ANPR cameras is informed by evidence of community safety concerns, crime prevention needs, or risks to public assets. The Council may consider incident reports, feedback from residents, and information provided by law enforcement or partner authorities when determining camera locations or reviewing existing installations. This ensures that surveillance remains necessary, proportionate, and justified.