



Additional Consultation Information

1. Executive Summary

Steypning Parish Council (SPC) proposes a targeted, proportionate public-space CCTV scheme to address evidenced levels of crime and anti-social behaviour while protecting individual privacy and rights under UK GDPR and the Data Protection Act 2018.

The lawful basis for processing is **Article 6(1)(e) UK GDPR**: performance of a task carried out in the public interest and in the exercise of official authority vested in the Council. Processing is **necessary and proportionate**, limited to clearly defined public-safety purposes, and designed to minimise intrusion.

A full Data Protection Impact Assessment (DPIA) has been completed prior to commissioning. Key privacy risks (over-collection, misuse, function creep, excessive retention and PTZ misuse) are mitigated through targeted siting, privacy masking, strict operational rules, role-based access controls, comprehensive audit logging, staff training, published policies and independent oversight.

Footage is retained for a **maximum of 60 days**, automatically deleted unless lawfully preserved for an active investigation or legal requirement. No audio recording is used. Cameras are oriented to avoid private dwellings. Transparency is ensured through clear signage, published policies, a complaints route and annual reporting.

Alternative measures were considered and assessed but were determined to be insufficient in isolation to achieve the stated objectives. The Parish Council does not have operational or budgetary control over police deployment or response levels within the area. In addition, the Council's wardens operate on a 40-hour working week and are required to patrol multiple settlements within the parish, which limits their ability to provide continuous or comprehensive coverage at any single location.

For these reasons, alternative measures alone cannot reasonably deliver the required level of deterrence, prevention, or evidential capability, and supplementary measures are therefore necessary.

The Council has stress-tested the scheme against ICO guidance, Surveillance Camera Code principles and potential legal challenge. With the controls set out in this document, residual risk is assessed as **low and acceptable**.

2. Proportionality

- Public areas only
- No audio recording
- Privacy masking where required
- No live monitoring of children's play.
- Review only following incidents.

3. Technology and System Design

- High-resolution fixed cameras and limited PTZ (Pan-Tilt-Zoom) units
- Low-light capability for night-time incidents
- Encrypted storage (at rest and in transit)
- Cloud-managed access with role-based permissions
- Full audit logs for viewing, export and deletion

Analytics are used to reduce unnecessary live monitoring and highlight relevant events only.

4. PTZ Cameras – Strict Operational Rules

To address ICO risk around intrusive surveillance, PTZ cameras are subject to the following non-negotiable controls:

- **Default fixed presets only** aligned to agreed public-space views
- Manual movement permitted **only** to verify a specific incident or imminent risk
- Each manual use must be **authorised, time-limited and logged** with reason
- Automatic return to preset position after use
- No use for general observation, curiosity viewing or behavioural monitoring

Any breach constitutes a disciplinary matter.

5. Retention, Access and Disclosure

- **Retention period:** maximum **60 days** to allow time for all incidents to be reported, an **annual review of retention length**, will be required with reduction if evidence supports
- Automatic deletion unless footage is:
 - required for an active investigation or subject to a lawful request or court order
- Access restricted to named, trained officers
- Disclosure to Sussex Police via documented, auditable request process
- Subject Access Requests handled in line with statutory timescales
- footage involving children is **treated as high-risk personal data**, with access restricted to the minimum necessary and prioritised for deletion unless required

6. Governance and Oversight

- SPC is the **Data Controller**
- Named system users: Parish Clerk (DPO role), Deputy Clerk, Neighbourhood Wardens
- Mandatory training on data protection and evidence handling
- Published CCTV Code of Practice
- Clear complaints and redress process
- Annual transparency report (usage, disclosures, complaints)
- Independent compliance checks or advisory review

7. Legal Compliance

The scheme complies with:

- UK GDPR
- Data Protection Act 2018
- ICO CCTV and Surveillance Camera guidance
- Surveillance Camera Code principles

Processing is lawful, fair, transparent, purpose-limited, data-minimised, secure and accountable.

8. Locations Proposed

Note: All camera locations will be confirmed following detailed site surveys, privacy mapping and completion of a Data Protection Impact Assessment (DPIA)

Fletcher's Croft (The Steyning Centre frontage)

- Rationale: This is a key community gateway with regular footfall, including the Steyning Centre entrance, outdoor gym and children's play area. Cameras would focus solely on public-access spaces and may include limited views of the adjacent car park. Positioning will avoid intrusive views into private properties.

Memorial Playing Fields (MPF)

- Rationale: The MPF is a heavily used recreational space for families and sports groups. Coverage will focus on the main car park, play areas and public assets such as changing facilities, benches and bins. The emphasis will be on child safety, deterrence of vandalism and rapid verification of serious incidents.

High Street

- Rationale: As the town's main commercial and social hub, initial coverage will be limited to the bus shelter and High Street car park, with views of key public thoroughfares where appropriate. The system will allow for future, evidence-led expansion along the High Street if justified.

Future mobile and targeted temporary deployments

- Rationale: Provision is included for short-term, mobile camera units to address specific issues such as fly-tipping or temporary anti-social behaviour. These units will be authorised, publicised, recorded and deployed only for the minimum period required

Proportionality and privacy

- Cameras will be directed at public routes, car parks and community assets, with no audio recording. All placements will be informed by public consultation and independent privacy assessment prior to installation.

9. Technology and Approach

The Council proposes the use of modern, cloud-managed CCTV technology combining high-quality imaging, on-device analytics and secure cloud services. The system is designed to support effective monitoring while embedding security, proportionality and privacy at every stage.

Cloud-managed platform:

The solution will be centrally managed through a secure cloud interface, enabling remote configuration, user management and alerting within a single administrative system. Robust access controls ensure only authorised users can access devices and footage.

On-device analytics and tailored alerts:

Cameras will include built-in analytics such as person, vehicle and motion detection, line-crossing and loitering alerts. This reduces the need for continuous live monitoring and ensures genuinely relevant events are surfaced. Alerts can be configured to notify named officers, log incidents, or integrate with wider alarm and emergency response processes.

Mobile surveillance units:

Alongside fixed cameras, the system will support lightweight mobile units that can be deployed and removed quickly by neighbourhood wardens. These units connect to the same cloud platform, ensuring consistent image quality, retention rules and audit logging. This allows targeted, time-limited deployment at emerging hotspots such as fly-tipping or short-term anti-social behaviour, with redeployment once issues subside.

Security & privacy by design:

The system will provide encryption in transit and at rest, fine-grained user roles, multi-factor authentication and full audit trails for all access and exports. Clear signage and privacy notices will explain what is being recorded and why, supporting transparency and public trust.

No audio recording:

In line with best practice for public-space CCTV, the Council does not propose any audio recording as part of this deployment.

Retention, storage and access:

Video footage will be stored securely for a limited, published retention period and deleted automatically unless required for a legitimate investigative purpose. Access will be restricted to authorised Council staff and Sussex Police through formal, auditable processes.

Future capabilities:

The platform is capable of supporting additional intelligent features such as verified event alerts or integrated alarm handling. Any future capability would be subject to policy approval, privacy assessment and public notification before use.

10. Conclusion

This is a measured, evidence-based CCTV proposal focused on real risks in defined public spaces. Strong legal controls, a 60-day retention limit and strict PTZ rules ensure privacy is respected while improving safety.

Residents are invited to comment before any final decision is taken.