



17th February 2025

Kingsbridge Town Council  
Quay House  
4 Ilbert Road  
Kingsbridge  
Devon  
TQ7 1DZ

Dear Sirs/Madam/ Councillor Members of Kingsbridge Town Council

In accordance with your published 'Complaints Procedure' and in response to a complaint sent via email by myself, I have been asked by the Town Clerk, to address any complaint to yourselves in writing. Please accept this letter as a formal complaint to Kingsbridge Town Council of the following nature.

In February 2024, Kingsbridge Town Council published an Instagram post on their official account with the caption "CCTV Be Warned". This post has since been removed. I am not including in this formal complaint an in depth criticism of their managing of their social media account as this would be a current distraction from the main subject of my complaint. I did express at the time in the comments section of the post that I found the narrative inappropriate and unsuitable for a public body. The Instagram post is important because it alerted me to the potential future installation of CCTV cameras in Fore Street, Kingsbridge. For clarification, I am a resident that lives at the above address but who also trades as an Independent Shop Keeper at said address. I am therefore not only a resident of Fore Street, but also a commercial business that operates from the same address.

As a resident and Shopkeeper of Fore Street, the installation of CCTV cameras in the street is an issue that has a direct affect on my life and the privacy with which I operate my life. The issue is also, naturally of interest to me as a tax payer who, as resident of Kingsbridge, pays a precept to Kingsbridge Town Council as part of my Council Tax to SHDC.

I was shocked to discover, after some investigations into minutes from meetings by KTC, that there has been no Public Consultation on the matter of potential CCTV installation in Kingsbridge. As a resident of Fore Street, I find it incredulous that my local council could consider, not just the installation of CCTV in a street with residents like myself, without consultation, but that such a substantial spend was not awarded a Public Consultation. After further research as a result of my frustration at the lack of representation I, as a resident of Kingsbridge, was clearly not receiving on the Council, I found further documentation supporting my disappointment and frankly, disgust at the lack of due diligence proportioned to this issue by KTC.

I engaged in an email dialogue with Councillors and have received replies from Martin Johnson signposting me to the Kingsbridge Town Council CCTV Code of Practice, a Police Liaison Committee report as well as providing me with some answers to questions regarding Budgeting Proposals.

In said email dialogue with Councillors, I have tried to establish if Kingsbridge Town Council, across their various committees and in discussions and adoption of proposals to install CCTV in Fore Street

completed certain essential governance. Disappointingly, I can find no evidence, and have not been provided evidence to suggest that Kingsbridge Town Council have thoroughly, effectively or in compliance with applied Government Guidelines to assess the proposed CCTV project in Fore Street.

My complaint therefore is that Members of Kingsbridge Town Council have not applied or complied with guiding principles published in 'Surveillance Camera Code of Practice: A Guide for Councillors' as published by the Government Surveillance Camera Commissioner. This document is easily accessible via GOV.UK and readily available to the General Public.

This document acts as a structure for Councillors' to rigorously approach the adoption of CCTV in a local area and I am concerned that this document has proved to have played no part in the decision making process, scrutiny and governance by Kingsbridge Town Council.

I asked the following questions of Kingsbridge Town Council and received no answers to the questions or provided evidence to the contrary so I believe that Members of Kingsbridge Town Council have failed to observe the Government Guide for Councillors and failed to comply with the Guiding Principles of said document.

The questions I asked were as follows:

1. Did members have access to and consider the Government Document "Surveillance Camera Code of Practice" at Full Council 12 Nov 2024?
2. Were members present at Full Council on the above date asked to consider said document before voting on Finance Committee 22/10/24 recommendations?
3. If the document in Question 1 was consulted, then according to said document what is the "specified purpose" to introducing CCTV in Fore Street?
4. Can you confirm Members acknowledged a "privacy impact assessment should be conducted"?
5. Have KTC conducted a Privacy Impact Assessment?
6. Have KTC published a Privacy Impact Assessment?
7. According to the said Government document, have KTC "adequately engaged with those affected by the cameras?" I have asked several traders and residents of Fore Street if they know anything about such a proposal and my conversation was the first introduction of the subject.

Kingsbridge Town Council haven't provide with me any answers to the above questions and it is clear they have failed to comply with the Guiding Principles of the 'Surveillance Camera Code of Practice: A Guide for Councillors'.

Kingsbridge Town Council have not carried out as mentioned under Principle Two in said document a Privacy Impact Assessment. KTC have not considered in detail any impact a proposed surveillance system will have "on individuals and groups in the society" and they have not published such an assessment. The Protection of Freedoms Act 2012 demands that CCTV cameras are only used in pursuit of a specified purpose. As the Guiding Principles outlines, the code seeks to balance the "need for cameras in public spaces with individuals' right to privacy". Kingsbridge Town Council is bound to comply with the code.

My complaint not only refers to the blatant disregard to the Code of Practice but I feel, the disregarding of this code alludes to the ignoring of fundamental requirements of Councillors as set out in the Localism Act 2011.

I believe that in disregarding the Code of Practice, that Councillors' have also disregarded the Localism Act 2011. In said Act, Councillors are required to "act in a way that secures public confidence in the role of a councillor" and to "exercise reasonable care & diligence". The Principle of Public Life to observe Accountability and to "submit themselves to the scrutiny to ensure this...to be accountable to the public for decisions & actions..."

My complaint therefore extends beyond the negligence of KTC to employ due governance to the project of installing CCTV in Fore Street, Kingsbridge to being a complaint that encompasses a lack of care, concern and consideration for the opinions, situations, concerns and well being of the residents of Kingsbridge. By failing to perform a Privacy Impact Assessment , failing to perform Public Consultation, failing to Inform the General Public of a project that undoubtedly will affect residents' , shopkeepers' and visitors' privacy in Kingsbridge; Kingsbridge Town Councillor have failed to be accountable to the public.

The British Institute of Human Rights have resources that are widely available to all and to which I would draw Councillors' attention. The Human Rights Act (Article 8) 'The right to respect for private and family life, home and correspondence' albeit a broad right, embodies my right to question Kingsbridge Town Council on their intended aims and the proportionality of their decisions by choosing to extend CCTV to Fore Street. I am not confident that Kingsbridge Town Council have employed the appropriate safeguarding measures, performed the correct governance or consulted the affected residents of Kingsbridge to truly defend their decision making or processes in relation to their Fore St CCTV project.

I seek to receive reassurance from Kingsbridge Town Council that their intended project to install CCTV cameras in Fore St, Kingsbridge will be suspended in practice and spending and that any attempt to resurrect or continue this project will be only on the grounds that Kingsbridge Town Council perform a full Privacy Impact Assessment according to the Code of Practice and commit to a full Public Consultation driven by the principles in said Code of Practice and that during that Public Consultation they are steered by the Localism Act 2011 and the Human Rights Act (Article 8).

In accordance with your Complaints Procedure, I will await acknowledge receipt of my complaint and your advising of when the matter will be considered by Full Council.

Yours faithfully,

