

Privacy Impact Assessment

1. INTRODUCTION

1.1 This Privacy Impact Assessment (PIA) CCTV is recommended in The Surveillance Camera Code of Practice, issued by the Surveillance Camera Commissioner in June 2013 in accordance with Section 30 (1) (a) of The Protection of Freedom Act 2012. The purpose of the PIA is to ensure that privacy risks are minimised while allowing the aims of the project to be met whenever possible.

1.2 Guidance is based on the ICO's Privacy Impact Assessment Handbook. The four areas which are highlighted by ICO as potential areas for loss of privacy in relation to personal data are; • the privacy of personal information; • the privacy of the person; • the privacy of personal behaviour; • the privacy of personal communications

1.3 'Personal data' as defined by Section 1 of the Data Protection Act means data which relates to a living individual who can be identified: (a) from those data, or (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

1.4 When considering the installation of a camera an Operational Requirement (OR) must be produced. The OR must be referred to as part of the installation and camera review process to ensure it meets and continues to be effective in addressing the purpose for which it was installed.

2. RESPONSIBLE PERSON CONTACT DETAILS

Below are the contact details of the person most qualified to respond to questions regarding this Privacy Impact Assessment.

Name: Laurel Niven

Title: Community safety and Resilience Team Leader

Email: laurel.niven@ashford.gov.uk

Telephone: 01233 330271

This PIA relates to:

	Deployable at Kennington playpark- 1 Trinity Rd, Kennington, Ashford TN25 4BY
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1	Why a Privacy Impact Assessment is Required Close proximately to residential area, school, playpark and nursery and viewing open public space
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1.1	What is the aim of the surveillance system?	To monitor following multiple reports of ASB within the local area, and prevention and detection of crime
1.2	What organisations will have access to CCTV images? Who will take legal responsibility under the Data Protection Act?	ABC AMC, and enforcement authorities
1.3	What are the benefits to be gained from the system and who will benefit?	To establish a safer community, provide reassurance, and to identify anyone in the area causing ASB. As well as accessing the need for future CCTV
1.4	Can CCTV realistically deliver these benefits?	Yes

2	Information Flow
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2.1	2.1 How is information collected?	Via accessing WCCTV software package
2.2	Where are the real time images from the camera displayed?	They will be stored on deployable camera cloud system
2.3	Who has operational access and ability to move the CCTV camera?	The licenced SIA AMC operators
2.4	How are the images recorded?	24/7 footage is recorded onto the deployable camera,
2.5	Where are the recorded images stored?	They will be stored on deployable camera cloud system
2.6	How is information stored?	Within the WCCTV package and via the SIM within the camera
2.7	What measures are in place to control access to the area in which the recorded images are stored?	Unique IP address, name and password and only SIA AMC operators can access the footage
2.8	How is information used	Prevention and detection of crime and public safety

2.9	How is access gained to the recorded images?	By using the unique IP address, name and password and only SIA AMC operators can access the footage
2.10	How long are the images retained?	31 days
2.11	How is information deleted	Auto deleted
2.12	When data is downloaded or copied for release to a third party how is information recorded?	Via a hard copy disc
2.13	What processes are in place to ensure that data protection responsibilities are understood by persons receiving the data?	Signed declaration on the release form

3.0	Data Protection Act
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3.1	Can less privacy intrusive solutions achieve the same objectives?	Patrols within the area could be carried out, but due to resourcing matters this can prove difficult If private cctv did exist then this could be utilised but unfortunately, there is none in the vicinity
3.2	Are images of identifiable individuals required or could the scheme use other technology not capable of identifying individuals?	Images would be helpful to support police in investigations
3.3	Will the particular equipment/system of work being considered deliver the desired benefits now and remain suitable in the future?	Yes
3.4	What future demands may arise for wider use of images and how will you address these?	Transfer of images only will be given to enforcement agencies
3.5	What are the views of those under surveillance?	The local businesses and have informed and they are in support Signage will be placed within the area, with a contact number provided

4.0	Human Rights Act
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4.1	What could we do to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed? Is the system established on a	Privacy zones on the camera, these cameras will not be monitored 24/7 and will only 2 viewed every 2 hrs to do a camera patrol or on a review if we believe a crime has taken place. Yes it is
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	proper legal basis and operated in accordance with the law?	
4.2	Is it necessary to address a pressing need, such as public safety, crime prevention or national security?	Yes
4.3	Is it justified in the circumstances?	Yes it is by the history of reports to ABC and enforcement agencies this has been going on within the area now for 1-2 year period, reports have been received by local residents, businesses and Cllrs
4.4	Is it proportionate to the problem that it is designed to deal with?	Yes an assessment has been carried out, and other methods have been carried out within the area prior to the use of a camera in terms of ASB surveys, neighbourhood action weeks and individual site meetings

5.0	Surveillance code of practice
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5.1	Do you regularly review the system against its objectives?	Yes we will monitor the amount of reports coming into the council and ask partner agencies as well as asking the local ward member
5.2	Is the system being used for any other purpose other than those specified?	No
5.3	Does signage exist highlighting the use of surveillance cameras?	Yes
5.4	Does the signage highlight the point of contact?	Yes
5.5	Are all staff aware of their responsibilities?	Yes
5.6	Can a member of the public request footage?	No

6.0	Risks
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6.1	Is the data shared with other organisations	Yes – only to enforcement agencies
6.2	Is the system operated in full compliance with (i) DPA requirements (ii) ICO codes of practice (iii) SCC codes of practice (iv) Human Rights Act	Yes

6.3	Do you have procedures in place to manage risks associated with the use of CCTV cameras	Yes
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7.0	Privacy Solutions	
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7.1	Have you identified solutions to address any risks identified	Yes
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Assessor

Signature: L NIVEN

Date: 07/08/23

Print Name: LAUREL NIVEN

Manager

Signature:



Date: 08/08/2023

Print Name: Gareth Recht

