

Privacy Impact Assessment – St Margaret’s at Cliffe Parish Council

Note: This PIA follows the Information Commissioner’s Office Code of Practice for conducting privacy impact assessments (code of practice 20140225 Version: 1.0)

Overview

St Margaret’s Parish Council has installed CCTV cameras in the Village car park, off Reach Road, in response to complaints of anti-social behavior affecting adjacent residents and occasional vandalism.

It has also installed cameras in the Village Hall, Reach Road, on behalf of the Village Hall Committee, following a recommendation of the Hall’s insurers.

St Margaret’s Parish Council has installed CCTV cameras on the pavilion in the George V Recreation Ground, off Reach Road, at the request of the cricket club and tennis club which use the facility and have reported crime or vandalism on several occasions.

St Margaret’s Parish Council seeks to prevent and detect crime on all three sites. It has fourteen cameras across the three local sites. The camera positions are listed in the Appendix

The purpose of recording images is to prevent crime or fraud and to detect it where prevention has failed.

The system captures images of the ground and buildings with only minimal horizon coverage of land adjacent to the sites. Images are recorded on digital recorders which are stored in locked cupboards and locked rooms. Images are only accessible from the system using a password at the Parish Council Office in the Village Hall or by remote access controlled by authorised operators. Remote access will only be used to check the correct functioning of the system.

System Operator

The System Operator is St Margaret’s Parish Council.

System Users

The System Users are operators authorised by St Margaret’s Parish Council. This includes two councillors and, when appropriate, the Community Warden and Police Community Support Officer.

Aims and Benefits

The aims are:

- To prevent crime, anti-social behavior and fraud and where necessary detect it
- To provide secure footage of detected crimes or incidents in order that they can be reported to, and investigated by the Police.

The benefits of the installations are:

- Crime is deterred by the presence of CCTV and signage

- Crime is detected where prevention fails and action can be taken to ensure that the property is safe and secure for use by the users of the premises.

The benefits to other parties are:

- Crime is detected and images recorded in order to help the Police with any investigations.
- The inhabitants of St Margaret's at Cliffe and the surrounding area and visitors are able to use the facilities safely and securely.

Needs Identified

Village Car Park

The Parish Council has in the past received complaints from residents living next to the car park of rowdy and anti-social behavior by groups of youths. It has also been informed of damage to parked vehicles on a few occasions. In addition to this there have been incidents of unlawful dumping of waste in the grassed area next to the public convenience.

The Village Hall

The Village Hall committee received advice from its insurance company that there had been incidences of false claims for injuries sustained in village halls and that CCTV would be an effective deterrent or source of evidence. The committee also had concerns about possible unauthorised use of the facilities or users not complying with conditions of hire.

King George V Field

This location includes a cricket pitch, tennis courts, an adventure playground, a pavilion and storage buildings. There have been several incidents of vandalism including removal of roof tiles, damage to guttering and pipes, damage to the tennis courts and fencing, attempts to set fire to wooden mobile wicket covers. There has been a break in to the pavilion which resulted in theft from the bar and considerable damage to internal doors. The Parish Council has also received complaints about dog owners allowing their dogs to run free and foul the field in contravention of notices placed around the site.

The Parish Council and the Village Hall Committee have concluded that a CCTV system would be the most effective deterrent to protect users of these sites.

Other options apart from CCTV

The car park is well lit and alternative strategies such as increased lighting have been discounted as not being feasible because the District Council is owner of the land.

The Parish Council pays for maintenance of the Public Convenience.

The Village Hall has a caretaker who opens and closes the facility and maintains it but he is not responsible for users complying with conditions of use. Increased lighting would not serve a useful purpose.

The King George V field is a large space and increased lighting would be inappropriate here as it is surrounded on three sides by residential dwellings. The pavilion already has security measures, such as metal shutters on windows, but this has not prevented criminal damage to external areas.

Information Flows

Information is continuously recorded on digital recorders located in the Public Convenience building in the car park, in the Village Hall office, in the storage room in the King George V pavilion. These are fed from fourteen cameras across the three sites. Footage is kept until the system overwrites previous information which lasts approximately 4-5 weeks until the hard disk is full. In the event of crime being reported the footage is reviewed by an authorised operator of the Parish Council. The company which installed the system will provide support to the Parish Council, to access information, when required. The system is managed from the Village Hall office where access to the CCTV account can be obtained and all cameras can be viewed. Connection is via the Internet. Authorised operators can also remotely access the system to check that the cameras and recorders are functioning correctly. Access is strictly controlled through application of the Parish Council CCTV policy. The system stores high definition images only – no sound is recorded. Images are recorded as colour during the day and in black and white at night.

The cameras are positioned and aimed so that only information about individuals and vehicles using the facilities are captured. The cameras do not record images of people on the highway or in their dwellings save for distant images in the background of the cameras. Face recognition and number plate identification software is not used.

Individuals will be told about the scheme by signage being erected in the area covered by the cameras. The contact details of the Parish Council as the scheme operator will be clearly displayed as will the purpose of the scheme – the prevention and detection of crime.

Personal data will only be recorded for the purposes of the prevention and detection of crime or fraud and will not be used for any other purposes.

Risks

The key risk associated with the project is that personal information in the form of video footage will be used for purposes other than the objectives of the project – the prevention and detection of crime at the facilities.

Mitigation/Privacy Solutions

The risk is mitigated by limiting access to the data to authorised persons and ensuring that the data is only provided to the Police for the investigation of crime, fraud or anti-social behaviour. Any requests for data to be used in other ways may be denied.

Data is to be kept under secure conditions – locked cupboard protected by physical security (a locked cabinet inside a locked building) and software security (password protected software to access video footage). Further, the deletion of data on a rolling 4-5 week recording process means that images recorded more than 5 weeks ago will be routinely overwritten.

Conclusion

The Parish Council believes that this PIA demonstrates that the CCTV installations represent an appropriate response to ongoing crime and security issues. This PIA has identified the risks and proposed mitigation or privacy solutions that protect the public whilst ensuring that the CCTV scheme can achieve its objectives.

Review

This PIA is to be reviewed annually on 1st October each year by the Authorised Users and a report is to be submitted to the Parish Council.

