

Paulton Memorial Park Charity (PMPC)

CCTV Installation – Guiding Principles

Definitions

SYSTEM OPERATOR

The body that takes a decision to deploy a surveillance system is responsible for defining the purpose, the control of its use and the processing of personal data. The system operator of the PMPC CCTV System is Paulton Parish Council, the corporate Trustee of the Charity. The Parish Council will operate the system on behalf of PMPC.

SYSTEM USERS

The persons employed by the System Operator with access to live or recorded images. The System Users of the PMPC CCTV System are the Parish Clerk, together with the Chairman and Vice-Chairman of the Parish Council.

GUIDING PRINCIPLES

12 principles which must be used to guide the use of the system (see Part 2).

THE PMPC CCTV SYSTEM

The ten cameras, DVR, cabling and internet switch located at Paulton Memorial Park, Village Hall and the Council office located in the village hall. (See Appendix 1).

PRIVACY IMPACT ASSESSMENT

Privacy impact assessments (PIAs) are a tool that used to identify and reduce the privacy risks of a project with regard to personal data. A PIA can reduce the risks of harm to individuals through the misuse of their personal information. It can also help organisations design more efficient and effective processes for handling personal data.

PERSONAL DATA

Data that can identify an individual and/or that can be used to inform actions or decisions that affect them.

Part 1 - Background

Following a number of incidents at Paulton Memorial Park the security and safety of users and property has become a concern for Paulton Parish Council as the Trustee. The PMPC Trust put forward a proposal to the Parish Council who are the Trustees and it was subsequently agreed that the Parish Council would fund the installation and operate of the system on their behalf.

Installing a CCTV system requires the System Operator to do a number of things which are set out in the Home Office Surveillance Camera Code of Practice (June 2013) and the Information Commissioner's Data Protection Code of Practice for Surveillance Cameras and Personal Information.(May 2015):

Determine that the system is in pursuit of a legitimate aim and that it is meeting a pressing need – both must be articulated clearly and documented in the stated purpose.

Adopt 12 guiding principles as set out in the Home Office Surveillance Camera Code of Practice (June 2013).

Carry out a Privacy Impact Assessment.

Notify the Information Commissioner of the system and ensure that the entry on the Register of Data Controllers reflects the use of the system.

Release data to authorised persons only.

Ensure that the System Users are trained to use the system.

Define an appropriate storage period.

Carry out an annual review of the deployment, use and operation of the system in order to ensure that its use remains justified.

Ensure that the area under surveillance is identified by the use of clear signage which must identify who the System Operator is.

Ensure that there are clear rules, policies and procedures in place for the use of the system.

Part 2 - Compliance with the two Codes of Practice Requirements by Paulton Parish Council (requirements in italics)

Determine that the system is in pursuit of a legitimate aim and that it is meeting a pressing need – both must be articulated clearly and documented in the stated purpose.

Paulton Parish Council, as the Trustee of the Paulton Memorial Park has a legitimate aim to ensure the safety of all users of the park and buildings and to prevent crime on the premises. The purpose of the PMPC System is to record images in a defined area of the Park in the interests of crime prevention and public safety.

*Adopt 12 guiding principles as set out in the Home Office Surveillance Camera Code of Practice (June 2013) Responses in **bold***

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need. **The purpose and aim have been articulated and will be kept under review.**
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified. **The system is set up to record data only on the premises of the Park and will only be used for the detection of crime.**
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints. **There is clear signage at the site (5 signs) which shows a contact point.**
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used. **The Parish Clerk, together with the Chairman and Vice-Chairman of the Parish Council, are responsible, as the System Users, for the collection of images and their use.**
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them. **There are clear rules for the use of the system and these have been communicated to the tenants of the Park and to other interested stakeholders (the Police).**
6. No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged. **The system is designed to record images and hold them until the storage is full at which time the system will overwrite previous images. The period of retention is commensurate with the length of time it may take for possible offences to come to light.**
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes. **Only the System Users are able to access image information and will only disclose images for law enforcement purposes. The contractor is able to provide a backup service in the event of an extended period of non-availability of the System Users.**
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards. **This principle does not apply in this case as the system is a single stand-alone system operated by the Parish Council.**

9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use. **The system is stored in a locked cupboard and in a locked room. Access to the system is protected by password protocols.**

10. There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published. **An annual review and audit will be carried out by the System Users which will be submitted to the System Operator for approval.**

11. When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value. **The system will be inspected monthly to ensure that images are of evidential value and that time and date stamps are working.**

12. Any information used to support a surveillance camera system which compares against a reference database for matching purposes should be accurate and kept up to date. **No reference database is to be used for matching purposes.**

Carry out a Privacy Impact Assessment.

A Privacy Impact Assessment has been carried out and is at Appendix 2.

Notify the Information Commissioner of the system and ensure that the entry on the Register of Data Controllers reflects the use of the system.

The ICO has been notified and a copy of the entry on the register is at Appendix 3.

Release data to authorised persons only.

Under the system policies and procedures (Appendix 4), the System Users are only authorised to release data to the Police unless a subject access request is received.

Ensure that the System Users are trained to use the system.

Training has been provided by the contractor and refresher sessions are planned.

Define an appropriate storage period.

Data will be stored until it is over-written by virtue of the loop recording system.

Carry out an annual review of the deployment, use and operation of the system in order to ensure that its use remains justified.

An annual review will be carried out in April 2018 and yearly thereafter.

Ensure that the area under surveillance is identified by the use of clear signage which must identify who the System Operator is.

There is clear and adequate signage which states the system operator.

Ensure that there are clear rules, policies and procedures in place for the use of the system.

See Appendix 4.