

# Privacy Impact Assessment – CCTV at Paulton Memorial Park Charity (PMPC)

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 of Project

Paulton Memorial Park (the Park) is managed by PMPC (the Charity) and Paulton Parish Council are the Trustees.

The Park is managed on a day to day basis by the Parish Councils Parks and Amenities committee and the Councillors of Paulton Parish Council, as the Trustees, oversee the work of the committee. The Park is open to the public although it is not public property. Nevertheless, the Charity considers that it has responsibilities for protection of privacy to the people of Paulton as a relevant authority under the Protection of Freedoms Act 2012 and has elected to follow the ICO Code of Practice. The Parish Council will operate the system on behalf of PMPC.

The PMPC CCTV project seeks to prevent and detect crime on the premises of the Park and buildings. It consists of ten CCTV cameras and DVRs. The camera positions are identified in Appendix 1 along with the layout of the Park and buildings. The purpose of recording images is to prevent crime and to detect it where prevention has failed.

The system captures images of the Park and buildings with only minimal horizon coverage of land outside the Park. Images are recorded on DVRs which are stored in a locked cupboard and in a locked room. Images are only accessible through the DVR system using a password or by remote access from the Parish Council's offices.

## System Operator

The Parish Council will operate the system on behalf of PMPC.

The System Operator is Paulton Parish Council acting as Trustee of the Park.

## System Users

The System Users are the Parish Clerk together with the Chairman and Vice-Chairman of Paulton Parish Council.

## Project Aims and Benefits

The Project aims are:

- To prevent crime and where necessary detect it
- To provide secure footage of detected crimes in order that they can be reported to, and investigated by, Avon and Somerset Police.

The benefits to the Paulton Memorial Park Charity 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 inhabitants of Paulton and the surrounding area.

The benefits to other parties are:

Crime is detected and images recorded in order to help **Avon and Somerset Police** with any investigations.

The inhabitants of Paulton and the surrounding area are able to use the Park safely and securely.

### **Need Identified**

The Park consists of a large car park, the Village Hall, wooden cabin, outdoor play area, memorial garden, tennis court, multi-purpose court, a children's play area, adult fitness equipment, wooden cabin and further open space for play. Crime has been reported on regular basis. Most crime is petty but there is regular evidence of vandalism.

The Park is open to the public at all times. The Village Hall is open 7 days a week depending on bookings.

### **Other options apart from CCTV**

The car park and parts of the park are well lit and alternative strategies such as increased lighting have been discounted as not being appropriate or likely to be effective. The park is well signed so that members of the public are aware of restrictions and the purposes of the park.

### **Consultation**

As a result of ongoing **anti-social behaviour**, petty crime and security issues, the Trustees of the park agreed that further crime prevention and detection measures were appropriate.

Discussions were held with Avon and Somerset Police (PCSO's) who were unable, due to manpower restrictions and priorities elsewhere in the area, to provide more regular patrols.

### **Information Flows**

Information is continuously recorded on the DVR located at the Village Hall (meeting room) from the ten cameras. Footage is kept until the system overwrites previous information as it is set on a continuous loop which lasts approximately 4-6 weeks. In the event of crime being reported the footage is reviewed by an authorised Officer of the Parish Council – the Clerk. In the absence of the Clerk, the company who installed the system will provide support for a to the Chairman and Vice Chairman of the Council, to access information.

Information is accessed via the DVR on site or through remote access using secure communications through the internet. Information provided to the Police will be stored on a removable memory stick which will be logged by the Parish Council before being handed to the Police.

All visitors to the Park who proceed through the areas covered (see Appendix 1) are affected as images of them are recorded. The system stores high quality 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 park are captured and that anyone outside the park is not identifiable on the system. The cameras do not record images of people on the highway or pavement, save for distant images in the background of the cameras.

Individuals will be told about the scheme by signage being erected in the area covered by the cameras and at the entry points to the Park. 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 and will not be used for any other purposes. The only data that will be recorded will be video footage of people using the Park .

Personal data will not be provided to any other body save for the investigation of crime by Avon and Somerset Police.

### **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 Park.

### **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 Avon and Somerset Police for the investigation of crime. Any requests for data to be used in other ways will 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 4-6 week recording meaning that images recorded more than 6 weeks ago will be routinely overwritten.

### **Conclusion**

The Charity believes that this PIA demonstrates that the CCTV project represents an appropriate response to ongoing crime and security issues at the Park. 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 1<sup>st</sup> April each year by the System Users and a report is to be submitted to the Parish Council as Trustees.

