

# HERTFORDSHIRE CCTV PARTNERSHIP Ltd

## CCTV Privacy Impact Assessment Form

### 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 The purpose of this Privacy Impact Assessment is to ensure compliance with the Surveillance Camera Code of Practice Principle 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.
- 1.3 Principle 2 identifies 'the need for a privacy impact assessment process to be undertaken whenever the development or review of a surveillance camera system is being considered to ensure that the purpose of the system is and remains justifiable, there is consultation with those most likely to be affected, and the impact on their privacy is assessed and any appropriate safeguards can be put in place. Where such an assessment follows a formal and documented process, such processes help to ensure that sound decisions are reached on implementation and on any necessary measures to safeguard against disproportionate interference with privacy. In the case of a public authority, this also demonstrates that both the necessity and extent of any interference with Article 8 rights has been considered.'
- 1.4 A privacy impact assessment also helps assure compliance with obligations under the Human Rights Act 1998 in particular Article which specifies that;
- (1) Everyone has the right to respect for his private and family life, his home and his correspondence.
  - (2) There shall be no interference by a public authority with the exercise of this right except such as in accordance with the law and as is necessary in a democratic society in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.
- 1.5 'Personal data' as defined by Section 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.

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### STORAGE AND MANAGEMENT OF CCTV RECORDED DATA –

- 2.1 The Hertfordshire CCTV Partnership CCTV Control Room operates a Code of Practice which ensures compliance with relevant legislation in relation to the management and operation of public space CCTV.
- 2.2 The CCTV Control Room is staffed by vetted and SIA licensed operational staff 24 hours a day, 365 days a year
- 2.2 CCTV recording equipment is contained within an additional secure storage area within the CCTV Control Room. Access to this area is for authorised personnel by appointment only and all callers are authenticated prior to entry and required to sign in and out of the premises.
- 2.4 Recorded images are recorded on to stand alone Network Video Recorders and retained for 28 days before being automatically deleted. Recorded images will only be retained for longer than 31 days if a request is made under the Data Protection Act, Freedom of Information Act, the Police and Criminal Evidence Act 1984 or the Criminal Procedures and Investigations Act 1996
- 2.5 The system is supported by an Uninterrupted Power Supply (UPS) and generator these are programmed to maintain a power supply to essential equipment in the event of total power failure.

### RESPONSIBLE PERSON CONTACT DETAILS

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

Name: Michael Read

Title: CCTV Operations Manager

Organisation: Hertfordshire CCTV Partnership Ltd

Email: [mike.read@stevenage.gov.uk](mailto:mike.read@stevenage.gov.uk)

Telephone: 01438 242814

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**Location:- Hertsmere Borough Council**

**Camera Numbers:-**

<b>20028</b>	<b>20029</b>								

**4 Camera Specific - Prior to INSTALLATION**

<b>1</b>	<b>Why are the cameras being considered for installation?</b>	<b>The camera is used in conjunction with HBC in response to crime and disorder incidents and monitor hot spot locations.</b>			
<b>2.</b>	<b>Has there been consultation before the camera was installed?</b>	<b>Yes</b>	<b>X</b>	<b>No</b>	
<b>2b</b>	<b>If yes, what was the outcome of the consultation?</b>	<b>Public Consultation</b>			
<b>2a</b>	<b>If no, why wasn't it undertaken?</b>	<b>N/A</b>			

**5 Camera Specific – Prior to INSTALLATION & REVIEW**

<b>3</b>	<b>What type of camera is being considered or in place?</b>	<b>WCCTV 3G Mini Domes</b>			
<b>4</b>	<b>Is audio recording an available feature of this camera?</b>	<b>Yes</b>		<b>No</b>	<b>X</b>
<b>4a</b>	<b>If yes; What measures are in place to protect private dialogue?</b>				
<b>5</b>	<b>Do the cameras have any other camera specific or software related features such as Automatic Number Plate Recognition, Facial Recognition,</b>	<b>Yes</b>		<b>No</b>	<b>X</b>

	<b>movement analysis?</b>				
<b>5a</b>	<b>If yes; What software/function?</b>	<b>N/A</b>			
<b>5b</b>	<b>What is the purpose of having/installing this function or software?</b>	<b>N/A</b>			
<b>5c</b>	<b>What measures are in place to protect privacy when using this function/software?</b>	<b>N/A</b>			
<b>6</b>	<b>Do the cameras have the capacity to record personal information.</b>	<b>Yes</b>	<b>X</b>	<b>No</b>	
<b>6a</b>	<b>If yes, please explain what and why?</b>	<b>The cameras are installed for community safety purposes in accordance with the Codes of Practice. The cameras are used by fully trained staff under the SIA. Any release of such evidence will be carried out under the DPA 1998, PACE 1984 or the Criminal Procedures and Investigations Act 1996.</b>			
<b>7</b>	<b>Is there any chance of this footage being released in the public domain?</b>	<b>Yes</b>	<b>X</b>	<b>No</b>	
<b>7a</b>	<b>If yes, explain why and what are the controls in place?</b>	<b>Images from the HCCTVP Ltd could be released into the public domain if it is in the interest of the identification of a suspect(s) involved in crime, public safety, national security or missing persons in accordance with our codes of practice.</b>			
<b>8</b>	<b>Is there a Data Protection Act compliant sign clearly displayed in close proximity of the camera to make people aware that CCTV is in operation?</b>	<b>Yes</b>	<b>X</b>	<b>No</b>	
<b>9</b>	<b>Do the cameras cover any part of any property where there is an expectation of privacy?</b>	<b>Yes</b>		<b>No</b>	<b>X</b>

9a	If yes what is covered?	N/A			
9b	What measures have been taken to prevent observation of these areas?	N/A			
10	Does any additional action need to be taken to reduce the impact on privacy by this camera?	Yes		No	

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**6 Camera Specific – POST Installation**

1	Has the purpose of the camera(s) been reviewed?	Yes	X	No	
		Date: Varies			
1a	What was the outcome of the Review?	Changes to locations.			
2	Has the Council every received a complaint relating to the impact on privacy by this camera?	Yes		No	X
2a	Please give details of the source and nature of the complaint and the outcome.	N/A			

Action to be taken	Responsibility of	By When	Status	Completed Date

**Assessor**

Signature:   *M. Read*   Date:   01.08.2017  

Print Name:   M.Read   Title:   Operations Manager  

**Manager**

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Print Name:   Keith Moore   Title: \_\_\_\_\_

**Review Date:-**

12.07.16	01.08.2017	01.08.2018			
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