



**CCTV / Radio Communications / Security & Key Holding**  
Privacy Impact Assessment- Public Space Surveillance Cameras

The privacy impact assessment (PIA) is recommended in the surveillance camera code of practice issued by the Surveillance Camera commissioner, in accordance with section 30(1) (a) of the protection of freedoms act2012. The purpose of the PIA is to ensure that privacy risks are maintained while allowing the aims of the project to be met whenever possible.

CCTV can be privacy intrusive, as it is capable of putting many law abiding people under surveillance recording their movements as they go about their day to day activities.

We must take into account what benefits are gained, whether other solutions exist, and what effect it may have on individuals.

These matters should be considered objectively as part of an assessment process on people’s privacy when considering the deployment of CCTV cameras.

We will use the results of the impact assessment to determine whether CCTV is justified in all the circumstances and if so how should it be operated in practice.

|                          |   |
|--------------------------|---|
| Name: Wayne Bluck        | Date: 05/04/19  |
| Position: Senior Officer | Organisation: RCT   |
| Camera Number/s 135-138  | Location/s: Ferndale Town Centre including RCT Car Parks.<br>High Street, The Strand, Lime Street |

1. Why is your organisation considering the use for using CCTV?

|                                     |                    |   |                      |                                     |                 |
|-------------------------------------|--------------------|---|----------------------|-------------------------------------|-----------------|
| <input checked="" type="checkbox"/> | Crime and Disorder | <input checked="" type="checkbox"/>     | Antisocial Behaviour | <input checked="" type="checkbox"/> | Hate Crime      |
| <input checked="" type="checkbox"/> | Youth Annoyance    | <input checked="" type="checkbox"/>     | Licensing Offences   | <input checked="" type="checkbox"/> | Security Issues |
| Other                               |                    | Public protection<br>Traffic monitoring |                      |                                     |                 |

2. What are the benefits to be gained from the use of CCTV?

|                                     |  |                                     |   |
|-------------------------------------|--|-------------------------------------|---|
| <input checked="" type="checkbox"/> | 1.To detect crime                                      | <input checked="" type="checkbox"/> | 5.To reduce crime and disorder                        |
| <input checked="" type="checkbox"/> | 2.To Reduce the fear of crime                          | <input checked="" type="checkbox"/> | 6.To Provide evidence for the criminal justice system |
| <input checked="" type="checkbox"/> | 3.To Reduce traffic congestion and improve road safety | <input checked="" type="checkbox"/> | 7.To provide evidence for civil proceedings           |
| <input checked="" type="checkbox"/> | 4.To Assist with gathering intelligence                | <input checked="" type="checkbox"/> | 8.Other   |

3. Can CCTV realistically deliver these benefits?

|        |        |        |        |        |        |        |        |
|--------|--------|--------|--------|--------|--------|--------|--------|
| 1. Yes | 2. Yes | 3. Yes | 4. Yes | 5. Yes | 6. Yes | 7. Yes | 8. Yes |
|--------|--------|--------|--------|--------|--------|--------|--------|

4. Can less privacy intrusive solutions such as improvised lighting achieve the same objective?

|    |   |
|----|---|
| No | Lighting has improved in the area, however this only assists the CCTV System. No other long term solution is available to provide security and public/community safety. |
|----|---|

5. Do your organisation need images of identifiable individuals/vehicles?

|     |   |
|-----|---|
| Yes | The system is capable of delivering high quality images, in compliance with regulations and produce sufficient evidential images for use of prosecuting bodies. |
|-----|---|

6. What are the views of those who will be under surveillance?

Names and addresses of residential premises that oppose the use of CCTV:

| Name: | Address:  |
|-------|---|
|       | <b><i>Local business and residents in the area were consulted!</i></b>  |
|       | <b><i>There were no objections to the town centre Public space surveillance system:</i></b>   |
|       | Additional consultation with SWP and local councillors formed part of the process. Direct consultation was restricted to residents who responded. Local businesses including private letting agencies were also consulted. Camera locations are assessed annually on the basis of current public expectations and perceptions. For example, if cameras are installed in an area where there is a vibrant night time economy and have been in position for many years we will not seek public consultation but <i>will</i> fully assess them to ensure they are still fit for what is deemed their original purpose. |

7. Will the system deliver the desired benefits now and remain sustainable for the future?

|   |
|---|
| Yes:<br>The system is maintained and updated to ensure continued high quality service |
|---|

8. Is CCTV proportionate to the problem?

|     |
|-----|
| Yes |
|-----|

9. Is it justified in the circumstances?

|      |
|------|
| Yes. |
|      |
|      |

10. Is it necessary to address a pressing need, such as public safety, crime prevention or national security?

|   |
|---|
| Yes<br><i>Images are required to be able to identify individuals who commit any breach of the scheme/s objectives and can be used for prosecuting bodies.</i> |
|---|

11. What could you do to minimise intrusion for those that may be monitored particularly if specific concerns have been raised?

Alter stop and rest positions to accommodate.  
Privacy zones on cameras where required.

12. Is the proposed camera deployment on a proper legal basis and operated in accordance with the law?

Yes  
All CCTV images are controlled under current legislation in accordance with the Data Protection Act 1998 and all data movement is fully documented. Organisations are not limited to the police and can include other bodies with enforcement powers, (such as customs and excise and some council departments)  
The scheme owners will maintain policies and procedures to meet the requirements of  
BS7958:2015  
BS7499:2013  
BS7858:2012  
ICO Code of Practice  
RIPA  
Human Rights Act  
Health and Safety at Work  
Surveillance Camera Commissioners COP

Signage required: Yes

Adequate signage has been distributed to strategic points relevant to the individual scheme. Main roads/Public areas.

### **Privacy Impact assessment review**

|                            |                   |                    |
|----------------------------|-------------------|--------------------|
| Camera Number/s<br>135-138 | Date:29/07/21     | Name: Liam Tavener |
| Location/s:                | Organisation: RCT |                    |

Changes implemented since installation : No

Have the authority received any complaints since installation: No  
(If yes give details).