

1. 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 Guidance is based on the ICO's Privacy Impact Assessment Handbook. The four areas which are highlighted by ICO as potential areas for loss of privacy in relation to personal data are;
- the privacy of personal information;
 - the privacy of the person;
 - the privacy of personal behaviour;
 - the privacy of personal communications
- 1.3 'Personal data' as defined by Section 1 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.

2. RESPONSIBLE PERSON CONTACT DETAILS

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

Name: Claire Barnes
Title: Town Clerk
Organisation: Hungerford Town Council, Church St, Hungerford, RG17 0JG
Email: townclerk@hungerford-tc.gov.uk
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3 DATA STORAGE & CONTROL

1	Why a Privacy Impact Assessment is Required	
1.1	What is the aim of the surveillance system?	<p>The use of the system shall be for the purpose of:-</p> <ul style="list-style-type: none">a) Providing Hungerford Town Council and Thames Valley Police with evidence to take criminal and civil action in the Courts;b) Reducing the fear of crime and providing reassurance to the public;c) Providing assistance in the detection and prevention of crime (including countering terrorism);d) Assisting with the maintenance of public order;e) Deterring or reducing the incidence of vandalism, graffiti, and other environmental crime;f) Deterring persons from committing crimes and to enhance the opportunities for detecting those who do;g) Improving the safety and security of residents, visitors and the business community;h) Discouraging anti-social behaviour including alcohol and drug-related elements;
1.2	What organisations will have access to CCTV images? Who will take legal responsibility under the Data Protection Act?	<p>Hungerford Town Council and Thames Valley Police are the main users of the CCTV system, However, other Police Forces and law enforcement agencies such as Fire and Rescue Service will be granted access to the system if a legitimate request is received.</p> <p>Hungerford Town Council will be the Data Controller at the point of images being recorded, however if any images are released to any of the authorised organisations, then the legal responsibility will be transferred to that organisation in relation to the images that have been released.</p>

1.3	What are the benefits to be gained from the system and who will benefit?	<p>Residents, visitors and businesses will benefit from improved public safety, and reductions in crime.</p> <p>CCTV is a proven tool in detecting crimes, and the perpetrators of it. Using CCTV can significantly reduce the time and cost on the Police service in investigating allegations.</p> <p>It is known that false allegations are made and CCTV is also useful in disproving some allegations. CCTV captures actual events and is not influenced by interpretation, or events, as seen by people who are under the influence of alcohol or drugs.</p>
1.4	Can CCTV realistically deliver these benefits?	Yes, and does so consistently
2 Information Flow		
2.1	How is information collected?	<p>The system provides on street video pictures, which are transmitted from cameras positioned in various locations throughout the town</p> <p>The transmissions are received in Hungerford Town Council office. The cameras are equipped with pan tilt and zoom facilities.</p>
2.2	Where are the real time images from the camera displayed?	<p>Real-time images are displayed on the monitor in the Town Council office and can also be accessed via the Clerk's PC.</p> <p>There is also the facility to transmit live video streams without control to Thames Valley Police; again, this is via a secure network into a secure control room environment.</p>
2.3	Who has operational access and ability to move the CCTV camera?	<p>HTC office staff and Smart Integrated Services (the CCTV contractor)</p> <p>Thames Valley Police can request live video streams but are unable to control any cameras. They can however be granted use of cameras in the control room under the Regulation of Investigatory Powers Act. This is strictly controlled by the Town Council office staff.</p>
2.4	How are the images	Each camera signal is continuously recorded by

	recorded?	way of a Digital Video Recorder
2.5	Where are the recorded images stored?	On the Hard Drive of the Digital Video Recorder, which is housed within the Town Council Office which is secured when not manned.
2.6	How is information used?	<p>Information is used to monitor public safety, and prevent and detect crimes.</p> <p>Evidence is provided for investigation and enforcement.</p> <p>Individuals can request copies of CCTV data which contains their personal information.</p> <p>Disclosure of data is covered by internal processes which are fully compliant with relevant legislation and codes of practice.</p>
2.7	How is access gained to the recorded images?	Password controls are in place on the system. Hard copy requests for images are required.
2.8	How long are the images retained?	One month
2.9	How is information deleted?	The data management system automatically deletes information after one month
2.10	When data is downloaded, or copied for release to a third party how is information recorded?	Memory stick or portable hard drive
2.11	What processes are in place to ensure that data protection responsibilities are understood by persons receiving the data?	Each request for data by the public must be requested via a signed data release form.
3	Data Protection Act	
3.1	Can less privacy intrusive solutions achieve the same objectives?	CCTV is a good solution to achieve the objects set out in 1.1
3.2	Are images of identifiable	The system must be capable of identifying

	individuals required or could the scheme use other technology not capable of identifying individuals	individuals, as footage from the system could be used in both criminal and civil court cases. If the system did not have this capability it would not be fit for purpose.
3.3	Will the particular equipment/system of work being considered deliver the desired benefits now and remain suitable in the future?	The service will remain a 24-hour service for the foreseeable future
3.4	What future demands may arise for wider use of images and how will you address these?	We will consider the benefits of additional cameras as and when required.
3.5	What are the views of those under surveillance?	The general feeling is that people who are not involved in crime are happy to be in an area that is monitored by CCTV cameras. There are some members of society both law abiding and those who are not, who have issues with being in areas covered by CCTV cameras. By abiding with current legislation, we aim to show that the CCTV system is only used for crime reduction/detection purposes and those activities that assist the public.
4	Human Rights Act	
4.1	What could we do to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed? Is the system established on a proper legal basis and operated in accordance with the law?	The system has been established on a proper and legal basis and we comply with the Data Protection Act, Human Rights Act and Regulations of Investigatory Powers Act. Regular reviews of camera performance are undertaken to justify their need.
4.2	Is CCTV justified in the circumstances?	Yes. Violence, theft and anti-social behaviour are key areas to address which in turn will reduce the fear of crime thereby creating a safer environment.
4.3	Is it proportionate to the problem that it is designed to deal with?	Yes. CCTV is used to detect crime and complies with the current legislation.
5	Surveillance code of	

practice		
5.1	Do you regularly review the system against its objectives?	Yes
5.2	Is the system being used for any other purpose other than those specified?	No
5.3	Does signage exist highlighting the use of surveillance cameras?	?
5.4	Does the signage highlight the point of contact?	?
5.5	Are all staff aware of their responsibilities?	?
5.6	Can a member of the public request footage?	Yes. The procedure of Data Subject Access requests is located on the Hungerford Town Council Website. It is also available in hard copy should it be requested. CCTV footage can only be supplied for one month from the date and time of an incident, after which time the images are automatically overwritten.
6 Risks		
6.1	Is the data shared with other organisations?	Yes, for investigation and enforcement
6.2	Is the system operated in full compliance with (i) DPA requirements (ii) ICO codes of practice (iii) SCC codes of practice (iv) Human Rights Act	Yes
6.3	Do you have procedures in place to manage risks associated with the use of CCTV cameras	Yes
7 Privacy Solutions		

	Have you identified solutions to address any risks?	The system is operated in line with relevant identified legislation and codes of practice.
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Town Clerk

Signature: Date:

Print Name: Claire Barnes

Mayor

Signature: Date:

Print Name: Cllr Martin Crane OBE