

Nettleham Parish Council
CCTV Data Protection Impact assessment
Mulsanne Park

Nettleham Parish Council– CCTV Privacy Impact Assessment

Location of surveillance camera system being assessed:

Mulsanne Field see appendices for exact locations and types of cameras being used.

Date of Assessment – September 2023

Review Date – September 2024

Name of Persons Responsible – Lucy Waller (Clerk) Jane Ashby (Facilities Manager)

1. The problems that need to be addressed and why the surveillance camera system is needed?
The surveillance camera system is needed to protect the public by dissuading crime and anti-social behaviour. Nettleham and in particular Mulsanne playing field has seen a rise in anti-social behaviour and criminal during recent months. The surveillance camera system is required as most of this activity takes place in the evening or at night.
2. Can surveillance camera technology realistically mitigate the risks attached to those problems?
In part as the visible cameras and signage will act to deter crime.
3. Have other less privacy-intrusive solutions such as improved lighting been considered?
Physical security, in the form of locked gates at night and lighting are in place but have failed so far to deter vandalism and crime.
4. What is the lawful basis for using the surveillance camera system?
The base for using the surveillance camera system is that it is necessary to be able to process data in order to support the work of the Police in detecting crime and ensuring public safety. It is in the public interest that crimes and anti-social behaviour committed in the Village are detected and where necessary the images can be used to support a criminal investigation that could lead to a successful conviction or outcome.
The surveillance cameras provide reassurance to the public and therefore can be lawfully used to provide a degree of protection to the individual.
5. What are the benefits to be gained by using CCTV?
To deter criminal activity
To make the public feel safer.
To deter anti-social behaviour
6. What are the views of those under surveillance?
Most of the public support the need for surveillance and would like it expanded to cover other parts of the village that have seen a rise in Anti-social behaviour. Many members of

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the public have installed private CCTV style systems to protect their own property. The majority feel safer with the surveillance system in place.

7. What are the benefits to be gained by using CCTV?

To deter criminal activity
To make the public feel safer.
To deter anti-social behaviour

8. What are the privacy issues arising from this surveillance system?

There is the possibility of Privacy intrusion into private homes, and the area under surveillance is frequently used by minors.

9. What privacy design feature will be adopted to reduce privacy intrusion.

Consideration has been taken when purchasing the specific cameras do not the capability to intrude beyond that which is for its specific purpose.
That private dwellings are protected from cameras having the ability to look for example into bedroom windows or back gardens (noting the expectation of privacy is normally less to the frontage of a property which is continually exposed in any event.)
Signage will be prevalent to advise all users of the areas where CCTV is used.

10. Which organisations will be using the surveillance camera images, and where is the controller responsibility under the GDPR and Data Protection Act 2018?

Nettleham Parish Council will use the images and have responsibility in conjunction with Lincolnshire Police if requested.

Sharing of images by Sports club via remote viewing of matches.

11. Do the images need to be able to recognise or identify individuals?

Yes, Individuals need to be recognised for Police purposes and to support any prosecutions.

12. How will you inform people that they are under surveillance and respond to Subject Access Requests, the exercise of any other rights of data subjects, complaints or requests for information?

Signage will be installed at key access points.
The CCTV policy, location of cameras and who to contact for Subject Access Requests will be placed on the Council website.

13. How will you know if the particular camera system/hardware/software/firmware being considered does deliver the desired benefits now and in the future?

The camera system will be reviewed on a regular basis at least every three years to assess that it is still delivering benefits for the residents of Nettleham.

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14. What future demands may arise for wider use of images and how will these be addressed?

If there is a demand for CCTV to be more widely used in Nettleham, the demand will be measured by calls for service and crime and anti-social behaviour reports. These will be assessed.

15. Have you considered the extent to which your surveillance camera system may interfere with the rights and freedoms conferred under the European Convention of Human Rights?

Yes, the camera locations have been carefully thought about where they will give a good coverage of the area and are not zoomed in to a particular location where they could be deemed to be invading privacy.

16. Do any of these measures discriminate against any particular sections of the community?

No, the surveillance cameras are not targeted at one particular group.

Appendix 1

Camera Locations and Types – Nettleham Parish Council

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ID	Justification/Expected use	Description (Static or Moving)	IMAGE	RECORDER LOCATION	CAMERA TYPE	STORAGE (DAYS)
1	Deter Crime and anti-social behaviour	Static	Colour	Cricket pitch	HiK Vision IP System	30
2	Deter Crime and anti-social behaviour	Static	Colour	Football pitch	HiK Vision IP System	30
3	Deter Crime and anti-social behaviour	Static	Colour	Seating area	HiK Vision IP System	30
4	Deter Crime and anti-social behaviour	Static	Colour	Storage Container	HiK Vision IP System	30
5	Deter Crime and anti-social behaviour	Static	Colour	Rear of Pavilion	HiK Vision IP System	30
6	Deter Crime and anti-social behaviour	Static	Colour	Car Park	HiK Vision IP System	30

Appendix 2

Information flow

1. How is information collected

CCTV Camera

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2. Does the system's technology enable recording?

Yes, only images recorded no audio capability. Recordings are only accessed by authorised Council representatives.

3. What type of transmission is used for the installation subject of this PIA?

Wirelessly communicated

4. What security features are there to protect transmission data e.g. encryption?

Data is encrypted.

5. Where will the information be collected from?

Public places – Mulsanne Field

6. From whom/what is the information collected?

General public. The cameras are there to reduce the fear of crime and to support any criminal or civil investigations.

7. What measures are in place to mitigate the risk of cyber attacks which interrupt service of lead to the unauthorised disclosure of images and information?

Password protected

8. How is the information collected

Recorded data disclosure to authorised agencies to support post incident investigating by and including law enforcement agencies

Recorded data disclosed to authorised agencies to provide intelligence.

9. How long is footage stored

30 days and automatically copied over. Except where it is needed by an authorised agency.

10. Retention Procedure

See above

11. With which external agencies/bodies is the information/footage shared?

Statutory prosecution agencies

Judicial system

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Legal representatives
Data subjects on request

12. How is the information disclosed to the authorised agencies

Images saved and passed on

13. Is there a written policy that specifies which agencies are granted access, how information is disclosed , how information is handled.

Yes

14. Do operating staff receive appropriate training to include the following?

Legislation issues

Monitoring, handling, disclosing, storage, deletion of information

Disciplinary procedures

Incident procedures

Limits on system use

In house training.

15. Do CCTV operators receive ongoing training?

yes

16. Are there appropriate signs which inform the public when they are in the area covered by surveillance camera systems?

Signage in place.