

Privacy Impact Assessment

Introduction

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.

Guidance is based on the Information Commissioner's Office (ICO) 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

'Personal data' as stated within article 4 of the UK GDPR means any information relating to an identified or identifiable natural person ('data subject'); an identifiable natural person is one who can be identified, directly or indirectly, in particular by reference to an identifier such as a name, an identification number, location data, an online identifier or to one or more factors specific to the physical, physiological, genetic, mental, economic, cultural or social identity of that natural person;

When considering the installation of a camera an Operational Requirement (OR) must be produced. The OR must be referred to as part of the installation and camera review process to ensure it meets and continues to be effective in addressing the purpose for which it was installed.

Ashford Borough Council operates the Public Space Surveillance (PSS) System in accordance with all laws and acknowledges that data may be release by investigatory bodies to identify persons of interest. A General Data Protection Regulation (GDPR) compliant sign is clearly displayed in the proximity of all cameras to inform persons that PSS is in operation.

PSS does not discriminate against any particular section of the community. PSS records actual events that have taken place. To mitigate against all reasonable privacy risks arising from the PSS system where possible all cameras will not be installed directly in line with a window where privacy would be expected. Where there is a risk to privacy both mechanical and/or digital privacy masks will be considered at time of the camera being installed and this will be reviewed on a regular basis. All members of staff are fully trained and licenced by the Security Industry Authority (SIA).

Responsible Person Contact Details

Below are the contact details for the person responsible for this PIA.

Name: Gareth Recht

Title: Monitoring Centre Team Leader

Postal Address: Safety and Wellbeing, Civic Centre, Tannery Lane, Ashford, Kent, TN23 1PL

Email: gareth.recht@ashford.gov.uk

Telephone: 01233 642095

This PIA relates to:

Camera Number	Camera Location
14	Civic Centre & Stour Centre Car Park, TN23 1PL
15	Civic Centre & Stour Centre Car Park, TN23 1PL
17	Civic Centre & Stour Centre Car Park, TN23 1PL
19	Flour Mills (East Hill) Car Park, Ashford, TN24 8PA
30	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
31	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
32	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
33	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
34	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
35	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
43	Vicarage Lane Car Park, Ashford, TN23 1NJ
45	Station Road Car Park, Ashford, TN23 1PP
46	Dover Place Car Park, Ashford, TN23 1HU
47	Dover Place Car Park, Ashford, TN23 1HU
56	Elwick Place Car Park, Ashford, TN23 1DY
57	Elwick Place Car Park, Ashford, TN23 1DY
62	Victoria Road Car Park, Ashford, TN23 7HQ
68	Julie Rose Stadium Car Park, Ashford, TN24 9QX
85	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
86	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
87	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG
88	Edinburgh Road Multi-Storey Car Park, Ashford, TN24 8LG

Camera Specifications

Camera Type	Make(s)	Camera numbers	Description	Justification
Static	Dahya	85, 86 & 87	Static Cameras in the stairwell of Edinburgh Road Car Park, Ashford	<ul style="list-style-type: none"> To ensure security of Council assets. To deter, prevent and detect crime. Helping to identify and prosecute offenders. Providing evidence in prosecutions.



				<ul style="list-style-type: none"> • Accident investigations. • Assist in identifying witnesses. • To reduce the fear of crime, enhance and reassure the general public's perception of safety.
Pan, Tilt, Zoom (PTZ)	Dahya	14, 15, 17, 19, 30, 31, 32, 33, 34, 43, 45, 46, 47, 62, 68, & 88	PTZ cameras within Ashford Borough Council (ABC) managed car parks throughout the borough of Ashford.	<ul style="list-style-type: none"> • To ensure security of Council assets. • To deter, prevent and detect crime. • Helping to identify and prosecute offenders. • Providing evidence in prosecutions. • Accident investigations. • Assist in identifying witnesses. • To reduce the fear of crime, enhance and reassure the general public's perception of safety.
	Hikvision	56 & 57		
High Zoom PTZ	Dahya	35	High Zoom PTZ camera on the top level of Edinburgh Road Car Park, Ashford.	<ul style="list-style-type: none"> • To ensure security of Council assets. • To deter, prevent and detect crime. • Helping to identify and prosecute offenders. • Providing evidence in prosecutions. • Accident investigations. • Assist in identifying witnesses. • To reduce the fear of crime, enhance and reassure the general public's perception of safety.
Licence Plate Recognition (LPR)	N/A	N/A	N/A	N/A
Body Worn Camera (BWC)	N/A	N/A	N/A	N/A



Location(s)

Location Type	Camera Type(s) Used	Camera numbers	Recording / Monitoring	Assessment of use including mitigations and/or justification
External public space in public access car parks within the borough of Ashford	PTZ & High Zoom PTZ	14, 15, 17, 19, 30, 31, 32, 33, 34, 35, 43, 45, 46, 47, 56, 57, 62 & 68	24/7 Recording via Ashford Borough Council (ABC) main CCTV system. 24/7 Monitoring from with ABC Monitoring Centre. This includes regular patrols of the CCTV cameras based on risk and intelligence information.	Privacy expectations in public access car parks are very low. Signs are clearly visible in reasonable proximity to the CCTV cameras to make all persons aware that PSS is in operation. To help mitigate any privacy concerns all cameras are operated by trained and SIA licenced personal only. The system used to monitor the CCTV cameras can only be accessed by authorised personal. A high zoom PTZ camera has been installed on the top floor of the car park so that it can be used to provide clear evidence both within the car park and surrounding areas
Internal Public space within the stair well of Edinburgh Road Car Park, Ashford	Static	85, 86, 87 & 88	24/7 Recording via Ashford Borough Council (ABC) main CCTV system. 24/7 Monitoring from with ABC Monitoring Centre. This includes regular patrols of the CCTV cameras based on risk and intelligence information.	Privacy expectations in the stair well of public access car parks are very low. Signs are clearly visible in reasonable proximity to the CCTV cameras to make all persons aware that PSS is in operation. To help mitigate any privacy concerns all cameras are operated by trained and SIA licenced personal only. The system used to monitor the CCTV cameras can only be accessed by authorised personal.

Camera(s) where additional mitigation is required

Camera Number	Camera Location	Reason for additional mitigation	Steps taken to reduce impact	
46	Dover Place Car Park	Windows to private dwellings	Privacy Masks	
			Operator training	X
			Operational audit	
			Other (Please explain):	

Assessed by:

Print Name: J.McInnes

Job Title: Monitoring Centre Supervisor

Date: Monday, 13 May 2024

Agreed by:

Print Name: G.Recht

Job Title: Monitoring Centre Team Leader

Signature:



Date: Monday, 13 May 2024