

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

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This PIA relates to:

Camera Number	Camera Location
72	31 Ashford Road (A28), Tenterden, TN30 6LL
73	East Cross, Tenterden, TN30 6AD
74	22 High Street, Tenterden, TN30 6AP
75	53 High Street, Tenterden, TN30 6BD
76	High Street Junction with Station Road, Tenterden, TN30 6JB
77	116 High Street, Tenterden, TN30 6HT
78	Junction of High Street (A28) / Small Hythe Road (B2082) / Rolvenden Road (A28), Tenterden, TN30 6JL
79	Bridewell Lane Car Park, Tenterden, TN30 6EY
80	Bridewell Lane Car Park, Tenterden, TN30 6EY
81	Waitrose Car Park, Tenterden, TN30 6BW
82	Recreation Ground Road, Tenterden, TN30 6RB
83	Tenterden Leisure Centre Car Park, Tenterden, TN30 6RA
84	Station Road Car Park, Tenterden, TN30 6HN



Camera Specifications

Camera Type	Make(s)	Camera numbers	Description	Justification
Static	N/A	N/A	N/A	N/A
Pan, Tilt, Zoom (PTZ)	Dahya	72, 73, 74, 75, 76, 77, 78, 79, 80, 81, 82 83 & 84	PTZ cameras in public areas within the Town of Tenterden.	<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.
High Zoom PTZ	N/A	N/A	N/A	N/A
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
High Street, Tenterden	PTZ	74, 75, 76 & 77	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 areas of a Towns High Street are very low. Signs are clearly visible in reasonable proximity to the CCTV cameras to make all persons aware that PSS is in operation within this area. 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.
Public Roads & foot paths within	PTZ	72, 73, 78 & 82	24/7 Recording via Ashford Borough Council (ABC)	Privacy expectations on public roads and footpaths are very low. Signs are clearly visible in reasonable proximity to the



Tenterden Town.			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.	CCTV cameras to make all persons aware that PSS is in operation within this area. 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.
External public space in Ashford Borough Council Managed car parks within the town of Tenterden	PTZ	79, 80, 81, 83 & 84	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.

Camera(s) where additional mitigation is required

Camera Number	Camera Location	Reason for additional mitigation	Steps taken to reduce impact	
73	East Cross Tenterden	Able to view private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
75	High Street Tenterden	Able to view private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	



77	High Street Tenterden	Able to view private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
79	Bridewell Lane Car Park Tenterden	Able to view private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
80	Bridewell Lane Car Park Tenterden	Able to view private dwellings	Privacy Masks	
			Operator training	X
			Operational audit	
			Other (Please explain):	
81	Waitrose Car Park Tenterden	Able to view private dwellings and a doctors surgery	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
82	Recreation Ground Road Tenterden	Able to view private dwellings and a doctors surgery	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
84	Station Road Tenterden	Able to view private dwellings	Privacy Masks	X
			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