

# 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](mailto:gareth.recht@ashford.gov.uk)

Telephone: 01233 642095

## This PIA relates to:

Camera Number	Camera Location
1	Civic Centre, Tannery Lane, Ashford, TN23 1PL
2	Civic Centre, Tannery Lane, Ashford, TN23 1PL
3	Civic Centre, Tannery Lane, Ashford, TN23 1PL
4	Civic Centre, Tannery Lane, Ashford, TN23 1PL
5	Civic Centre, Tannery Lane, Ashford, TN23 1PL
6	Civic Centre, Tannery Lane, Ashford, TN23 1PL
7	Civic Centre, Tannery Lane, Ashford, TN23 1PL
8	Civic Centre, Tannery Lane, Ashford, TN23 1PL
9	Civic Centre, Tannery Lane, Ashford, TN23 1PL
10	Civic Centre, Tannery Lane, Ashford, TN23 1PL
11	Civic Centre, Tannery Lane, Ashford, TN23 1PL

## Camera Specifications

Camera Type	Make(s)	Camera numbers	Description	Justification
Static	Dahya	1, 2, 3, 4, 6, 7, 8, 9, 10, 11	Static Cameras internally and on the perimeter of the Civic Centre building.	<ul style="list-style-type: none"> <li>To ensure security of Council assets.</li> <li>Deterring and detecting crime (Including health &amp; safety infringements).</li> <li>Helping to identify and prosecute offenders.</li> <li>Providing evidence in prosecutions.</li> <li>Accident investigations.</li> <li>Identifying behaviour, in the workplace, that an employer could not reasonably ignore.</li> </ul>
Pan, Tilt, Zoom (PTZ)	Dahya	5	PTZ camera on the perimeter of the Civic	<ul style="list-style-type: none"> <li>To ensure security of Council assets.</li> <li>Deterring and detecting crime</li> </ul>



			Centre building.	<p>(Including health &amp; safety infringements).</p> <ul style="list-style-type: none"> <li>• Helping to identify and prosecute offenders.</li> <li>• Providing evidence in prosecutions.</li> <li>• Accident investigations.</li> <li>• Identifying behaviour, in the workplace, that an employer could not reasonably ignore.</li> </ul>
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
External public space around the Civic Centre, Tannery Lane	Static & PTZ	1, 2, 3, 4, 5, 6	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 external areas around the Civic Centre 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 licenced personal only. The system used to monitor the CCTV cameras can only be accessed by authorised personal.
Internal within public access areas of the Civic Centre, Tannery Lane	Static	7, 8, 9, 10, 11	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	Privacy expectations within the internal public access areas of the Civic Centre are low. This area is used by both staff and members of the public who have come to the Civic Centre. To help mitigate any privacy concerns all cameras are operated by trained and licenced personal only. The system used to monitor the CCTV cameras can only be accessed by authorised personal. Cameras



			cameras based on risk and intelligence information.	can only view the public areas and not inside private offices or meeting rooms.
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### Camera(s) where additional mitigation is required

Camera Number	Camera Location	Reason for additional mitigation	Steps taken to reduce impact	
N/A	N/A	N/A	Privacy Masks	
			Operator training	
			Operational audit	
			Other (Please explain):	

#### Assessed by:

Print Name: J.McInnes

Job Title: Monitoring Centre Supervisor

Date: Thursday, 11 January 2024

#### Agreed by:

Print Name: G.Recht

Job Title: Monitoring Centre Team Leader

Signature:

Date: Monday, 13 May 2024