

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
12	Tannery Lane, Ashford, TN23 1PL
13	Tannery Lane, Ashford, TN23 1PL
16	Tanner Lane, Ashford, TN23 1PL
18	Ashford Skatepark, Tannery Lane, Ashford, TN23 1PL
20	East Hill, Ashford, TN24 8PA
21	1-3 High Street, Ashford, TN24 8TH
22	33 High Street, Ashford, TN24 8TF
23	51 High Street, Ashford, TN24 8SG
24	60-62 High Street, Ashford, TN24 8SZ
25	Ashford Bandstand, High Street, Ashford, TN24 8SA
26	Junction of Castle Street/New Rents/High Street, Ashford, TN24 8SD
27	33 New Rents, Ashford, TN23 1JJ
28	St George's Square, Ashford, TN24 8UU
29	Park Street, Ashford, TN24 8LF
36	Taylor's Passage, Ashford, TN24 8TA
37	6-10 North Street, Ashford, TN24 8JN
38	Park Street, Ashford, TN24 8JS
39	Churchyard, Ashford, TN23 1QG
40	12 Tufton Street, Ashford, TN23 1QP
41	Junction of Bank Street & Tufton Street, Ashford, TN23 1DE
42	St Johns Lane, Ashford, TN24 8TF
44	35-41 Station Road, Ashford, TN23 1PP
48	International House, Dover Place, Ashford, TN23 1HU
49	Junction of Beaver Road/Victoria Road/A2042, Ashford, TN23 1EZ
50	Mill Court Cycle Path, Ashford, TN24 8DP
51	County Square, Ashford, TN23 1AE
61	Victoria Road, Ashford, TN23 7HE
63	Junction of Jemmett Rd & Bowens Fld, Ashford, TN23 4QA
66	Junction of Mace Lane/Hythe Road/Mill Court, Ashford TN24 8PU
69	Julie Rose Stadium, Willesborough Road, Ashford, TN24 9QX
70	Bockhanger Car Park, Belmont Road, Ashford, TN24 9JJ
71	Bockhanger Shops, Ashford, TN24 9JE



Camera Specifications

Camera Type	Make(s)	Camera numbers	Description	Justification
Static	Dahya	23	Static Camera in Ashford Town Centre	<ul style="list-style-type: none">• 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.
Pan, Tilt, Zoom (PTZ)	Dahya	12, 13, 16, 18, 20, 21, 22, 24, 25, 26, 27, 28, 29, 36, 37, 38, 39, 40, 41, 42, 44, 49, 50, 51, 61, 63, 66, 69, 70 & 71	PTZ cameras in public areas within the town 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.
High Zoom PTZ	N/A	48	High Zoom PTZ camera on top of Internation House	<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
High Street/Town Centre, Ashford	Static & PTZ	21, 22, 23, 24, 25, 26, 27, 28, 29, 36 & 37	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/Town 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 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 Ashford Town.	PTZ & High Zoom PTZ	12, 13, 16, 20, 38, 39, 40, 41, 42, 44, 48, 49, 50, 51, 61, 63, 66, 70 & 71	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 on public roads and footpaths 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.
External public space in area of Ashford Skatepark, Tannery Lane	PTZ	18	24/7 Recording via Ashford Borough Council (ABC) main CCTV system. 24/7 Monitoring from with ABC Monitoring	Privacy expectations within the area of an open public Skatepark are low. Signs are clearly visible in reasonable proximity to the CCTV camera to make persons aware that PSS is in operation. To help mitigate any privacy concerns all cameras are operated by trained and licenced



			Centre. This includes regular patrols of the CCTV cameras based on risk and intelligence information.	personal only. The system used to monitor the CCTV cameras can only be accessed by authorised personal. Having a camera in this location helps to ensure that persons wishing to use the Skatepark can do so safely.
Sports Stadium (External)	PTZ	69	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 at a public sports stadium are low. This camera is in an external public area which is overlook by a public footpath and residential properties. 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.

Camera(s) where additional mitigation is required

Camera Number	Camera Location	Reason for additional mitigation	Steps taken to reduce impact	
			Privacy Masks	
13	Tannery Lane	Whilst camera is at standard zoom and in operation, it is possible to see into two upper windows of a private property in Mill Court.	Operator training	X
			Operational audit	
			Other (Please explain):	
22	High Street Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
24	High Street Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X



			Operational audit	
			Other (Please explain):	
25	High Street Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
26	High Street Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
27	New Rents/Forge Lane Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
28	St Georges Square Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
37	North Street Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
38	Park Street Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X



			Operational audit	
			Other (Please explain):	
40	Tufton Street Ashford	Possible to see inside private dwellings	Privacy Masks	
			Operator training	X
			Operational audit	
			Other (Please explain):	
41	Bank Street Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
42	St Johns Lane Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
49	Station Road Ashford	Possible to see inside hotel accommodation	Privacy Masks	X
			Operator training	X
			Operational audit	
			Other (Please explain):	
69	Julie Rose Ashford	Possible to see inside private dwellings	Privacy Masks	
			Operator training	X
			Operational audit	
			Other (Please explain):	
70	Belmont Road Ashford	Possible to see inside private dwellings	Privacy Masks	X
			Operator training	X



			Operational audit	
			Other (Please explain):	
71	Bybrook Road Ashford	Possible to see inside 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