

Privacy Impact Assessment – Pannier Market CCTV

1 Privacy Impact Assessment

- 1.1 What is the aim of the surveillance system? To detect, deter and prevent crime and to improve public safety and public reassurance.
- 1.2 What organisations will have access to CCTV images? Who will take legal responsibility under the Data Protection Act? South Molton Town Council (SMTC) and Devon and Cornwall Police are the main users of the CCTV system. SMTC is the Data Controller at the point of images being recorded, however, if any images are released to any of the authorised organisations, then the legal responsibility will be transferred to that organisation in relation to the images that have been released.
- 1.3 What and who will benefit from the system? Pannier Market users and the general public will benefit from improved public safety, and reductions in crime.
- 1.4 Can CCTV realistically deliver these benefits? Yes, the installation of a CCTV camera was recommended by the police
- 1.5 Why is a Privacy Impact Assessment required? The surveillance system collects personal data (CCTV Data).

2 Information Flow

- 2.1 How is information collected? Through the use of an overt public space CCTV camera. Cameras record 24 hours per day.
- 2.2 Where are the real time images from the camera displayed? No real time images are displayed.
- 2.3 Who has operational access? Only One SMTC Employee has access.

Devon and Cornwall Police can be granted use of cameras in the control room under the Regulation of Investigatory Powers Act. This is strictly controlled and only authorised by the rank of Superintendent or above.

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2.4	How are the images recorded?	Digital Storage Media/ Hard Drive
2.5	Where are the recorded images stored?	Town Hall Market Office
2.6	How is information stored?	A digital recording and data management system is in place which covers all data collected by the CCTV surveillance system.
2.7	What measures are in place to control access to the area in which the recorded images are stored?	Secure access to the CCTV control room.
2.8	How is information used?	<ul style="list-style-type: none">• Information is used to monitor public safety and prevent and detect crimes.• Evidence is provided for investigation and enforcement.• Individuals can request copies of CCTV data which contains their personal information.• Disclosure of data is covered by internal processes in full compliance with relevant legislation and codes of practice.
2.9	How is access gained to the recorded images?	Data management control levels established on system. Password controls on system. Hard copy requests for images required.
2.10	How long are the images retained?	Approx 31 Days by movement only
2.11	How is information deleted	The data management system automatically deletes information after 31 days unless it has been saved in the systems evidence locker.
2.12	When data is downloaded or copied for release to a third party how is information recorded?	DVD or Hard Drive
2.13	What processes are in place to ensure that data protection responsibilities are understood by persons receiving the data?	Each request for data must be requested via a signed data release form. In case of the Police this is authorised by a person at the rank of Sergeant or above.
2.14	What precautions are in place to ensure that data will continue to be collected in the event of a failure of power?	No Data Collected in event of Power Cut

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3. Risks

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| 3.1 | Have you identified solutions to address any risks identified? | The system is operated in line with relevant legislation and codes of practice. |
| 3.2 | Is the data shared with other organisations? | Yes for investigation and enforcement. |
| 3.3 | Is the system operated in full compliance with
(i) DPA requirements
(ii) ICO codes of practice
(iii) SCC codes of practice
(iv) Human Rights Act? | Yes |
| 3.4 | Do you have procedures in place to manage risks associated with the use of CCTV cameras? | Yes |

4. Privacy

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| 4.1 | Can less privacy intrusive solutions achieve the same objectives? | No, the system was installed on the advice of the police and due to the extent of vandalism at the rear and front of the Pannier Market. |
| 4.2 | Are images of identifiable individuals required or could the scheme use other technology not capable of identifying individuals? | The system must be capable of identifying individuals, as footage from the system will be used in both criminal and civil court cases. If the system did not have this capability it would not be fit for purpose. |
| 4.3 | Will the particular equipment/system of work being considered deliver the desired benefits now and remain suitable in the future? | Yes, SMTC will continue to operate the system on a 24-hour basis in line with all relevant legislation. |
| 4.4 | What future demands may arise for wider use of images and how will you address these? | Legislation can and does change. We will comply with all future regulations placed upon us. |
| 4.5 | What are the views of those under surveillance? | Market Traders are happy to be in an area that is monitored by CCTV cameras. |

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5 Human Rights Act

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| 5.1 | What could we do to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed? Is the system established on a proper legal basis and operated in accordance with the law? | The system is specifically to deter crime and make ATM service users feel safer. The system has been established on a proper and legal basis and we comply with the Data Protection Act, Human Rights Act and Regulations of Investigatory Powers Act. |
| 5.2 | Is it necessary to address a pressing need, e.g. public safety, crime prevention or national security? | Yes. To deter crime and anti social behaviour at the rear and front of the Pannier Market. |
| 5.3 | Is it justified in the circumstances? | Yes. |
| 5.4 | Is it proportionate to the problem that it is designed to deal with? | Yes. CCTV is used to detect crime and complies with the current legislation |

[END]