

Document: Packington Village CCTV Scheme Privacy
-----Impact Assessment
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**VILLAGE CCTV SCHEME
PRIVACY IMPACT ASSESSMENT
(PIA)**

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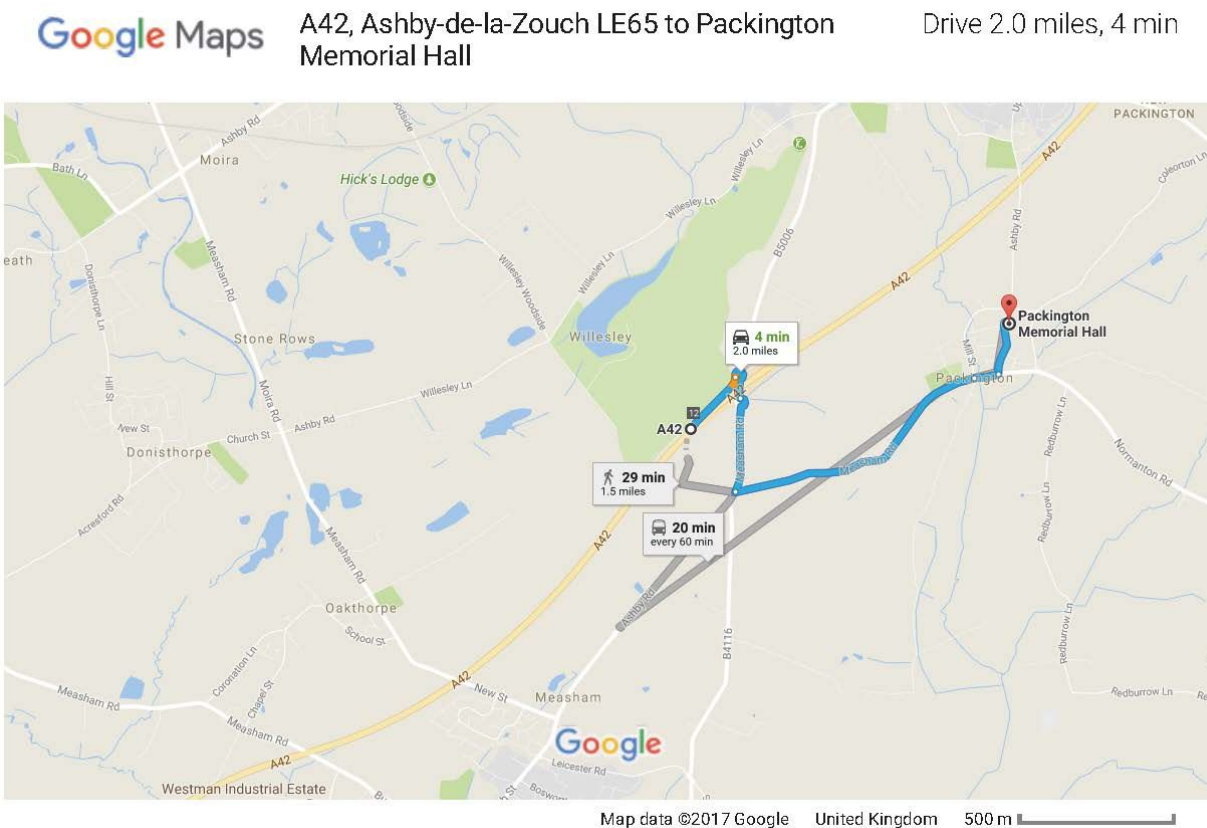
1. INTRODUCTION

1.1 Packington Village CCTV Scheme Purpose

The defined purpose of the CCTV scheme within Packington Village is to promote public confidence by developing a safe and secure environment for the benefit of those residing, employed, visiting or using the facilities of the area covered by the Packington Village CCTV system.

1.2 Current Situation and Case for Change

Packington is a rural Leicestershire village, set close to the A42 junctions 12 and 13, allowing simple and quick access to and from the village (less than 4 minutes by car).



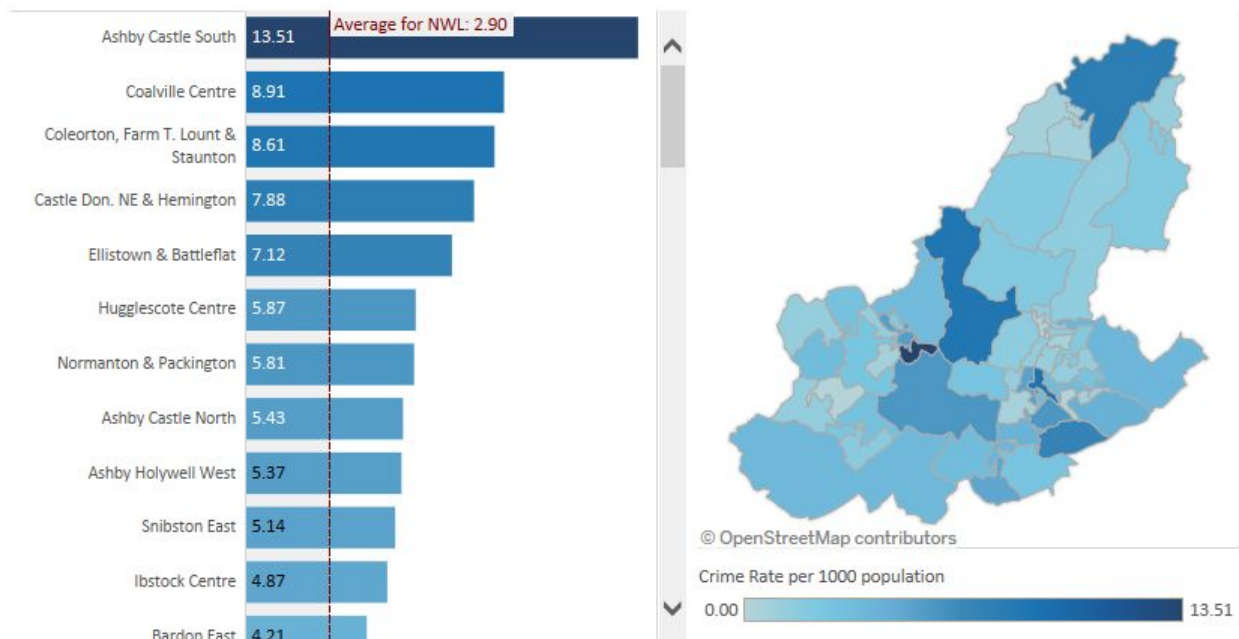
The 'Safer North West Leicestershire Community Safety Partnership' comprises a number of organisations including North West Leicestershire District Council, Leicestershire County Council, Leicestershire Police, Leicestershire Fire and Rescue Service, the Probation Service, local housing associations and others.

Its purpose is to work together to protect North West Leicestershire residents, communities, businesses and visitors from crime and disorder which may cause them harm

Crime rate data sourced from Safer North West Leicestershire Community Safety Partnership for the period of July 2016 - June 2017 demonstrates that Normanton & Packington have:

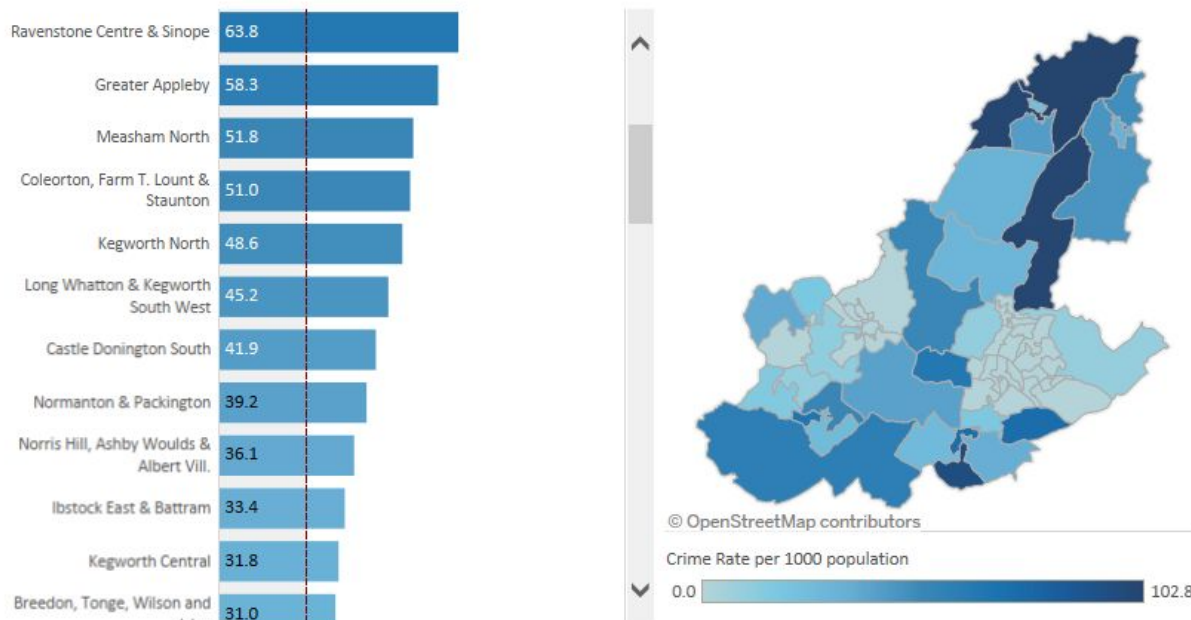
- A crime rate of 5.81 per 1,000 population for the category of 'burglary non dwelling', which is **2.0 times higher** than the average for North West Leicestershire of 2.90 (Figure 2)
- A crime rate of 39.2 per 1,000 population for the category of 'rural crime', which is **double** the average for North West Leicestershire (Figure 3)
- A crime rate of 14.53 per 1,000 population for the category of 'theft from vehicle, which is **2.3 times higher** than the average for North West Leicestershire of 6.26 (Figure 4)
- A crime rate of 15.26 per 1,000 population for the category of 'vehicle offences', which is **1.9 times higher** than the average for North West Leicestershire of 8.04 (Figure 5)

Figure 1 - Map Showing Geography of Packington Village to A42



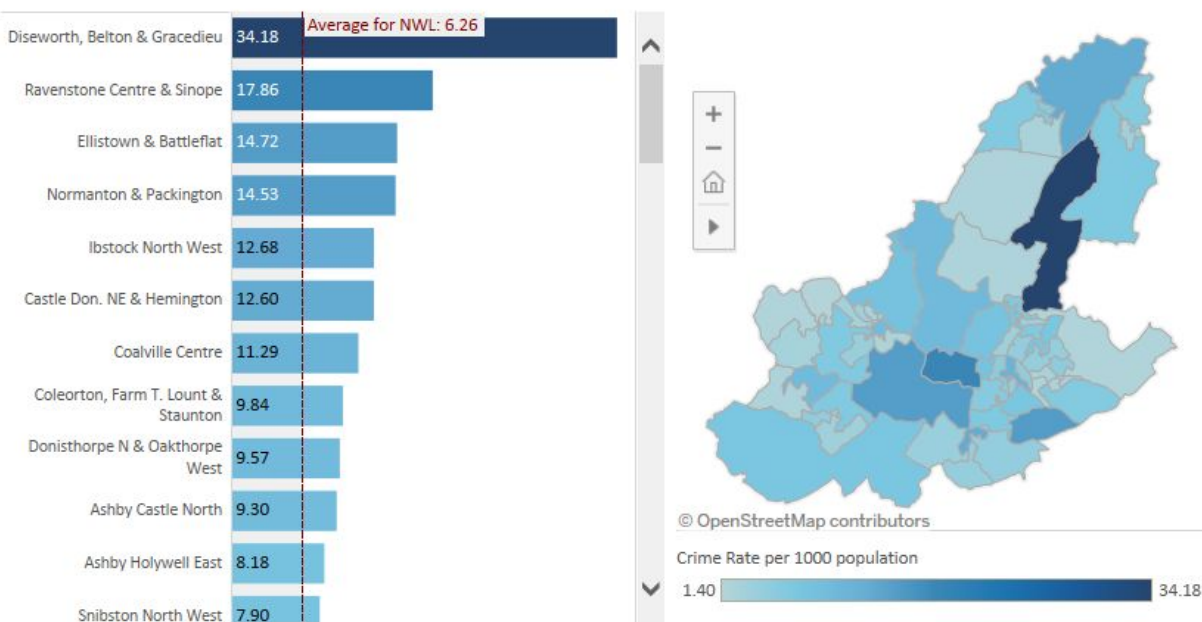
Produced by Strategic Business Intelligence, Leicestershire County Council, Contact: karen.earp@leics.gov.uk , 0116 305 7260

Figure 2 - Burglary Non Dwelling



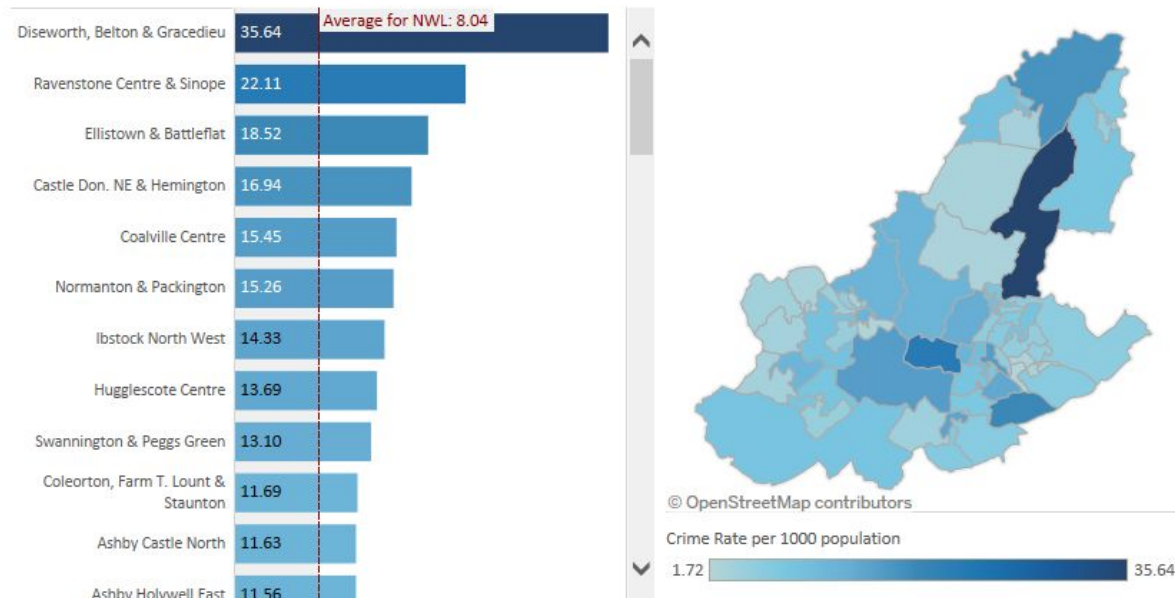
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Figure 3 - Rural Crime



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Figure 4 - Theft From Vehicle



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Figure 5 - Vehicle Offences

As the above data demonstrates, Packington Village has crime rates significantly higher than the average of North West Leicestershire. The area is also suffering from an increase in fly tipping.

Packington may be suffering higher than average crime rates due to its proximity to a national road network and easy access from surrounding towns eg Ashby, Coalville, Measham, Swadlincote. The lack of CCTV cameras in rural areas unlike Towns and Cities may be exacerbating the situation.

There is a pressing need to maintain surveillance of Packington Village for the purpose of preventing and reducing crime including antisocial behaviour and environmental crimes. This is a legitimate aim and has been the reason behind the installation of CCTV in many towns and villages in Britain.

The aim of the CCTV scheme is to provide CCTV coverage of vehicles entering and leaving Packington. The system will not be used to invade the privacy of any individual, except when carried out in accordance with the law.

The benefits of the scheme are:

- reduce the fear of crime by persons living and work in the village;
- provide immediate data on vehicle movements after a crime event
- reduce fly tipping in the area by checking vehicle movements after such events
- to assist the police, the Parish Council and Law Enforcement Agencies with identification, detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime, public order or contravention of bye-laws;
- to deter potential offenders by publicly displaying the existence of CCTV, having cameras clearly sited that are not hidden, and signs on display throughout Packington Village

1.3 Packington CCTV Scheme Proposal

The scheme would consist of the following:

- 6 CCTV cameras located around the village, 4 focused on the villages entrances/exits and 2 located on the major streets within the village
- High resolution cameras, sending data via broadband to a central secure server
- Cameras focused on roads record only when motion detected
- Data stored for a limited time period on the central secure server (Managed by Initsys Ltd)

Contact point for future privacy concerns:

Packington CCTV Manager, Co-opted by Packington Parish Council.
% Memorial Hall, High Street, Packington E-mail: cctv@packington.info

1.4 Privacy Impact Assessment Need

Using CCTV can be privacy intrusive because it is capable of putting law-abiding people under surveillance and recording their movements as they go about their day to day lawful activities. Careful consideration should be given to whether to use it, or not. The fact that it is possible, affordable and has public support should not be the primary motivating factor. Packington

Neighbourhood Watch Group should take into account what benefits can be gained, whether better solutions exist, and what effect it may have on individuals. The existence of a 'Pressing need' should be established.

Packington Neighbourhood Watch Group considers these matters objectively as part of an assessment of the scheme's impact on people's privacy. Details of the information flow are provided in section 2, the consultation process that has been followed is described in section 3, privacy and related risks are shown in section 4. To address privacy and related risks, section 5 details proposals for risk reduction with approvals and outcomes in sections 6 and 7 respectively.

2. INFORMATION FLOW

The Packington Village CCTV Scheme aims to collect vehicle movements in and out of the village as both a deterrent and for Police analysis after a crime. An image will be taken of each vehicle entering and leaving the village. The cameras are motion activated and as they are focused on the road carriageways only, they will record images of every vehicle entering and leaving the village (On the 4 routes). Additional cameras on roads within the village will provide data as to their routes when in the village. The scheme will only record images and will not have Automatic Number Plate Recognition (ANPR) or Facial Recognition.

The camera will capture all entrants and exits and this will include vehicles of; residents, guests to the village, workers in the village, social care/health care professionals, Service personnel eg post, refuse workers, grounds, transient vehicles travelling through the village etc.

The images will be sent immediately to a secure data centre via broadband network and will be encrypted. The central data centre is managed by Initsys Ltd. The data will be retained for 21 days, after which it will be automatically deleted.

The stored data will only be accessed when it is approved after an incident by an approved data handler. Reasons for access will be recorded, approval needed and the data viewed/downloaded recorded.

3. CONSULTATION

To ensure the village has been consulted and agreement reached, the following steps have been taken:

1. Analysis of problem and solutions
2. Presentation to Packington Neighbourhood Watch Group
3. Agreement by Packington Neighbourhood Watch to proceed
4. Agreement by Packington Parish Council to proceed with the project
5. Village informed of project through village magazine, village email system, village website - 6th May 2017
6. Village meeting to present proposal, inform and seek objections
7. In follow up to the Village meeting, no objections have been received
8. North West Leicestershire District Council have been consulted
9. Leicestershire Police have been sent details of the Scheme

4. PRIVACY AND RELATED RISKS

Privacy issue	Risk to individuals	Compliance risk	Associated organisation risk
Collecting/ exceeding purposes of CCTV system	New surveillance methods may be unjustified intrusion on persons privacy	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Retention of images/information for longer than necessary	Owner retaining personal images/information longer than necessary	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Lack of policies and procedures and mechanisms	No public availability of CCTV code of Practice which details how personal data handled, stored, disclosed etc.	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Lack of signage	Public not made aware that they are entering an area monitored by surveillance system	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions

5. PRIVACY AND RELATED RISK REDUCTION

Risk	Solutions(s)	Result	Evaluation
Collecting/ exceeding purposes of CCTV system	Restrict collection of images/information to identified purposes and locations. Implement appropriate technological security measures and document.	Reduced	Cameras are motion activated only. Location of the cameras restricted to 6 locations and are focused on the road carriageways only.
Retention of images/information for longer than necessary	Introduce retention periods to only keep information for as long as necessary. These are specified in the publicly available CCTV Codes of Practice.	Reduced	As stated retention periods introduced and specified are justified, compliant and proportionate.
Lack of policies and procedures and mechanisms	Produce policies for handling, storage, disclosure of images/information and make them publicly available in the CCTV Codes of Practice.	Eliminated	Relevant policies now available as stated (Packington Village CCTV Policy). This is now justified, compliant and proportionate
Access of data beyond authorised personnel.	Policy for access and authorisation.	Eliminated	Subject access checklist and request form created and included within CCTV policy.
Lack of signage	Gap analysis of area covered by CCTV system to ascertain if there is prominently placed signage at the entrance to the area monitored and also within that area. All signs to be mapped and audited regularly.	Reduced	A gap analysis should be completed and map of locations of signage defined.

6. APPROVAL

Risk	Approved solution	Approved by
Collecting/ exceeding purposes of CCTV system	Restrict collection of images/information to identified purposes and locations. Implement appropriate technological security measures and document.	
Retention of images/information for longer than necessary	Introduce retention periods to only keep information for as long as necessary. These are specified in the publicly available CCTV Codes of Practice.	
Lack of policies and procedures and mechanisms	Produce policies for handling, storage, disclosure of images/information and make them publicly available in the CCTV Codes of Practice.	
Access of data beyond authorised personnel.	Policy for access and authorisation.	
Lack of signage	Gap analysis of area covered by CCTV system to ascertain if there is prominently placed signage at the entrance to the area monitored and also within that area. All signs to be mapped and audited regularly.	
Collecting/ exceeding purposes of CCTV system	Restrict collection of images/information to identified purposes and locations. Implement appropriate technological security measures and document.	

7. PRIVACY IMPACT ASSESSMENT OUTCOMES

Action to be taken	Date for completion	Responsibility for action
A gap analysis should be completed and map of locations of signage defined.	10/02/2018	Packington Neighbourhood Watch CCTV Manager
Annual review of Packington Village CCTV Scheme need, policy, privacy impact assessment	Annually	Packington Neighbourhood Watch CCTV Manager