

Privacy Impact Assessment

This Privacy Impact Assessment Template comprises two parts: Level one considers the general details of the camera surveillance system and supporting business processes. Level two considers the specific implications for the installation and use of cameras

Level One

Surveillance camera system being assessed:

Royal Borough of Greenwich (RBG) Community Safety CCTV System

Date of assessment: **6th November 2017**

Review date: **November 2018**

Name of person responsible: **Lorraine Hancock, CCTV Assistant Manager**

Data Protection Act 1998 and Surveillance Camera Code of Practice 2013		
1	What is the organisation's purpose for using the CCTV and what are the issues that the system aims to address?	<p>The purpose of the CCTV system is:</p> <ul style="list-style-type: none"> • To reduce the fear of crime, disorder and anti-social behaviour. • To deter crime. • To detect crime and provide evidential material for court proceedings. • To enhance community safety, assist in developing the economic well-being of the Royal Borough of Greenwich and encourage greater use of the town centres, university, car parks, open spaces and shopping areas etc. • To assist the Local Authority in its enforcement and regulatory functions within the Royal Borough of Greenwich. • To assist in Traffic Management. • To assist in supporting civil proceedings, which will help detect crime. • Any other specific objective identified by the owners or partners of the scheme.
2	Can CCTV technology realistically deliver these benefits?	Yes. Proactive use of the CCTV system enables crime to be detected and evidential material recorded for use in criminal proceedings by police and other enforcement agencies.

3	What are the views of those who will be under surveillance?	<p>The RBG CCTV system evolved from the formation of a Community Safety Partnership between a number of organisations. Through the representatives of the partnership it enjoys local public support from council members and residents.</p> <p>Local consultation for new cameras is undertaken as part of the planning application process giving council members and residents the opportunity to comment on or influence decisions.</p> <p>The RBG CCTV system has been awarded the Surveillance Camera Commissioner Certificate of Compliance valid until 2022 and the BSI awarded Quality management System ISO9001 for the provision of CCTV services. These awards provide extra reassurance to the public.</p>
4	Have other less privacy-intrusive solutions such as improved lighting been considered?	<p>New requests for CCTV are referred to the Safer Communities Team for problem solving. The problem solving process would consider less privacy-intrusive solutions and would only recommend CCTV if no alternative solutions can be found.</p>
5	What are the benefits to be gained from using CCTV?	<p>The use of CCTV provides live operational support to emergency services and other partners and can provide recorded evidence for use in prosecutions.</p> <p>CCTV, can either independently or when used together with other crime prevention measures be very effective. Proactive monitoring is highly effective in preventing and detecting crime and can result in a reduced fear of crime.</p>
6	What are the privacy issues arising from this surveillance camera system?	<p>The privacy issues are:</p> <ol style="list-style-type: none"> 1. Overlooking private space 2. Recording of personal data 3. Retention and deletion of data 4. Excessive or inappropriate monitoring 5. Data handling and provision
7	Have any privacy by design features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements?	<p>The following safeguards have been implemented to ensure the privacy of data:</p> <ol style="list-style-type: none"> 1. Secure CCTV control room and restricted access 2. Automated digital data deletion after 31 days 3. Evidence handling procedures 4. Privacy zones/masking on specified cameras 5. Privacy checks 6. Inspectorate certification and audit 7. Staff training and supervision processes

8	<p>What organisations will be using the CCTV images and where is data controller responsibility under the Data Protection Act 1998?</p>	<p>The RBG CCTV system has been notified to the Information Commissioner and is included in the Data Protection Register.</p> <p>The primary use of system data will be by police and other enforcement agencies and statutory authorities with powers to prosecute.</p> <p>Under the terms of Data Protection Legislation, individual access to personal data, of which that individual is the data subject, is permitted subject to provisions.</p> <p>A Service Level Agreement is in place with the Metropolitan Police.</p> <p>The RBG Head of Governance, Systems Performance and Customer Experience has all other data sharing responsibilities.</p>
9	<p>Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?</p>	<p>In order to meet the crime objectives of the system individuals need to be identified in order for them to be prosecuted.</p> <p>Controllable pan, tilt and zoom cameras have the ability to zoom in at great distance and are used proactively to obtain the identities of individuals as necessary.</p> <p>When not being proactively used cameras are positioned to provide an area overview and enable monitoring with minimum personal data capture.</p>
10	<p>Will the CCTV equipment being installed and the system of work being adopted be sustainable? Is there sufficient funding for the scheme?</p>	<p>The RBG CCTV system is funded from the corporate budget and includes, staffing, transmission costs and materials etc. A four year maintenance contract is in place for repairs and camera replacements/upgrades.</p>
11	<p>Will the particular system/equipment being considered deliver the desired benefit now and in the future?</p>	<p>The system has been designed to enable future expansion or upgrades as required with minimal impact and cost.</p> <p>Regular contract meetings are held with the term maintenance provider and consideration is given to any recommended changes or advances in technology in order for the system to continue to meet its' community safety aims and objectives.</p>
12	<p>What future demands may arise for wider use of images and how will these be addressed?</p>	<p>There are no known current or perceived plans to use the community safety CCTV system for any other purposes. Any external future demands will be addressed when appropriate.</p>

Human Rights Act 1998

Section 6(1) of the Human Rights Act 1998 (HRA) provides that it is unlawful for a public authority to act in a way which is contrary to the rights guaranteed by the European Convention on Human Rights. Therefore in addition to the above, if you are a public authority, you must make sure that your system complies with the requirements under the HRA.

1	Is the system established on a proper legal basis and is it operated in accordance with the law?	Section 163 of the Criminal Justice and Public Order Act 1994 creates the power for local authorities to provide closed circuit television. Information sharing for the purposes of community safety is provided under section 115 of the Crime and Disorder Act 1998. The system also operates in accordance with the Data Protection Act 1998. The system has been awarded the Surveillance Camera Commissioner Certificate of Compliance valid until March 2018.
2	Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?	<p>Royal Greenwich is committed to maintaining and improving the safety, well-being and quality of life for those who live, work or visit the Royal Borough.</p> <p>The Safer Communities Service enables the Royal Borough to meet its statutory responsibilities in working with partner agencies, bodies and groups to reduce crime and disorder within the boundaries of the Royal Borough. It is also involved in a number of operational crime reduction panels and initiatives.</p> <p>The provision of a proactive and effective and high-quality CCTV system is vital to delivering this commitment through maintaining a strong visible enforcement presence in key public spaces and by its ability to manage emergency incidents and improve public safety.</p>
3	Is it justified in the circumstances?	The use of CCTV is justified as it provides considerable operational and evidential benefits for the authority and emergency services in order to achieve a reduction in crime and enhanced public safety. CCTV also enjoys support by local residents and council members.
4	Is it proportional to the problem that it is designed to deal with?	The Royal Borough CCTV system is proportional to the problem that it is designed to deal with and is professionally accredited. The system only uses overt (visible) cameras in public areas where they are unlikely to impact on the privacy of any individual. Processes are in place to address the concerns of any individual who believes that a specific camera has a negative impact on their expectations of privacy.
5	Do any of these measures discriminate against any particular sections of the community?	The Royal Borough CCTV system operates within strategic borough wide locations in order to achieve its aims and objectives for the benefit of all residents. Management plans, processes and staff training in legislation requirements ensure that no section of the community is disproportionately impacted upon.

Privacy Impact Assessment Level Two: Cameras Specification

ID	Camera Types	Makes and Models used	Amount	Description	Justification and Expected Use
1	Static	JVC TK-C1460B Sony Ernitech Ruggedized Dome Vista 580 TVL Pecan D056C Micro dome Bosch IP	476	Static images, no movement or zoom function.	Public Safety cameras recorded 24hrs.
2	PTZ	Plettac FAX830 Pelco Spectra 1V Bosch Dinion JVC TK 1460BE	208	Pan tilt and zoom function, standard definition.	Public Safety cameras recorded and proactively monitored 24hrs.

Privacy Impact Assessment Level Two: Location Assessment

Cat	Location Type	Camera Types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
A	Town Centre	2	70	24hrs	24hr proactive monitoring by a minimum of 2 operators and a maximum of 4 operators. High hourly patrol	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.
B	Residential Street	2	70	24hrs	24hr proactive monitoring by a minimum of 2 operators and a maximum of 4 operators. Medium hourly patrol	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.
C	Riverside	2	17	24hrs	Low hourly patrol or as required based on intelligence.	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.
D	Parks and open spaces	2	18	24hrs	Low hourly patrol or as required based on intelligence.	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.
E	Housing blocks internal and external	1	423	24hrs	Low hourly patrol or as required based on intelligence.	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.
F	Business and retail	2	30	24hrs	24hr proactive monitoring by a minimum of 2 operators and a maximum of 4 operators. High hourly patrol	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.

Cat	Location Type	Camera Types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
G	Industrial sites	2	4	24hrs	Low hourly patrol or as required based on intelligence.	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.
H	Foot Tunnels	1	52	24hrs	Low hourly patrol or as required based on intelligence.	All cameras are for the stated purpose and overt. Privacy expectation is low. Appropriate signage is in place for CCTV stating its use and purpose with contact details.

Privacy Impact Assessment Level Two: Additional Mitigation

Camera Number	Reviewed	Camera TYPE	Location Category	Further Mitigation/ comments (optional)
75	15/06/2016	2	B	This camera is in a residential location and at the height at which it has been installed there is an ability to see into residential windows and gardens. At the request of a nearby resident this risk has been removed through the use of a privacy zone.
76	15/06/2016	2	C	This camera was originally installed in a riverside location and used to monitor the river walk. Recent nearby large scale residential development in the area means that the camera has the ability to see into residential windows. At the request of a nearby resident this risk has been removed through the use of a privacy zone.
220	15/06/2016	2	B	This camera is in a residential location and at the height at which it has been installed there is an ability to see into residential windows. At the request of a nearby resident this risk has been removed through the use of a privacy zone.

Agreed with: Community Safety CCTV Assistant Manager

Date: April 2017

Review Date: April 2018

Crime Data: Summary of Total Offences 2016/17

Year	Total	Annual Change	
		#	%
2013/14	19,632	N/A	N/A
2014/15	21,027	1,395	7.1%
2015/16	21,955	928	4.4%
2016/17	24,211	2,256	10.3%

Time	From	RBG Change	
		#	%
3 Year	2013/14	4,579	23.3%
2 Year	2014/15	3,184	15.1%
1 Year	2015/16	2,256	10.3%

Year	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec	Jan	Feb	Mar
2014/15	1,646	1,693	1,867	1,991	1,602	1,840	1,788	1,733	1,640	1,819	1,587	1,821
2015/16	1,740	1,848	1,789	1,890	1,795	1,745	1,839	1,919	1,823	1,916	1,747	1,904
2016/17	1,870	1,935	2,073	2,133	1,993	2,014	2,054	1,954	1,947	2,100	1,912	2,226

