



FIELDWAY COURT, BIRKENHEAD, WIRRAL, CH41 4LQ
CCTV Privacy Impact Assessment Form

INTRODUCTION

- 1.1 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 minimized while allowing the aims of the project to be met whenever possible.
- 1.2 The purpose of this Privacy Impact Assessment is to ensure compliance with the Surveillance Camera Code of Practice Principle 2 - The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
- 1.3 Principle 2 identifies 'the need for a privacy impact assessment process to be undertaken whenever the development or review of a surveillance camera system is being considered to ensure that the purpose of the system is and remains justifiable, there is consultation with those most likely to be affected, and the impact on their privacy is assessed and any appropriate safeguards can be put in place. Where such an assessment follows a formal and documented process, such processes help to ensure that sound decisions are reached on implementation and on any necessary measures to safeguard against disproportionate interference with privacy. In the case of a public authority, this also demonstrates that both the necessity and extent of any interference with Article 8 rights has been considered.'
- 1.4 A privacy impact assessment also helps assure compliance with obligations under the Human Rights Act 1998 in particular Article 8 which specifies that;
 - (1) Everyone has the right to respect for his private and family life, his home and his correspondence.
 - (2) There shall be no interference by a public authority with the exercise of this right except such as in accordance with the law and as is necessary in a democratic society in the interests of national security, public safety or the economic wellbeing of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.
- 1.5 'Personal data' as defined by the General Data Protection Regulation (GDPR) means data which relates to a living individual who can be identified:
 - (a) from those data, or

- (b) from those data and other information which is in the possession of, or is likely to come into the possession of, the data controller, and includes any expression of opinion about the individual and any indication of the intentions of the data controller or any other person in respect of the individual.

STORAGE AND MANAGEMENT OF CCTV RECORDED DATA –

- 2.1 The Magenta Living CCTV Control Room operates a Code of Practice which ensures compliance with relevant legislation in relation to the management and operation of public space CCTV.
- 2.2 The CCTV Control Room is staffed by vetted and SIA licensed operational staff 24 hours a day, 365 days a year
- 2.3 CCTV recording equipment is contained within an additional secure storage area within the Magenta Living IT server room. Access to this area is for authorised personnel by appointment only and all callers are authenticated prior to entry and required to sign in and out of the premises.
- 2.4 Recorded images are recorded on to stand alone Network Video Recorders and retained for 28 days before being automatically deleted. Recorded images will only be retained for longer than 31 days if a request is made under the General Data Protection Regulation, Freedom of Information Act, the Police and Criminal Evidence Act 1984 or the Criminal Procedures and Investigations Act 1996
- 2.5 The system is supported by an Uninterrupted Power Supply (UPS) generator and these are programmed to maintain a power supply to essential equipment in the event of total power failure.

RESPONSIBLE PERSON CONTACT DETAILS

Below are the contact details of the person most qualified to respond to questions regarding this Privacy Impact Assessment.

Name: Paul Robinson
Title: Emergency Response Manager
Organisation: Magenta Living
Email: paulrobinson@magentaliving.org.uk
Telephone: 0808 100 9596

3. Location of cameras:

Cameras will be located across all blocks at Fieldway Court and will include:

- **2 - Corner mounted DS-2DF8225IX-AEL Ultra Series DarkFighter 2MP IR Cameras (PTZ)**
- **28 - DS-2CD2146G2-ISU Pro Series AcuSense IP67 4MP Fixed Dome IP Cameras**
- **25 - Optical Zoom Dome IP Camera**

4. Camera Specific - Prior to INSTALLATION

1.	Why is a camera being considered for installation ?	Fieldway Court and the immediate surrounding area has been identified as being an Anti Social Behaviour hot spot which includes Drug Dealing, Drug Use, Prostitution, Fly Tipping and Criminal Damage. Magenta Living has made numerous attempts to tackle such behaviour including installation of more resilient fencing and gates, improving lighting in the area, increasing security patrols at the location and working with Merseyside Police to identify and prosecute individuals, however incidents of ASB and crime remain high. The use of CCTV monitoring is intended to deter and identify perpetrators, reduce crime and ensure safety of tenants and properties. The use of these CCTV cameras is intended to assist Magenta Living in creating a long term, sustainable community.			
2.	Has there been consultation before the camera was installed?	Yes	X	No	
2a.	If yes, what was the outcome of the consultation?	Magenta Living received no objections to the CCTV camera being installed following consultation. We did receive 73 responses from tenants confirming they would support the installation of this CCTV camera.			
2b.	If no, why wasn't it undertaken ?	N/A			

5 Camera Specific – Prior to INSTALLATION & REVIEW

3.	What type of camera is being considered or in place?	As above			
4.	Is audio recording an available feature of this camera?	Yes		No	X
4a.	If yes; What measures are in place to protect private dialogue?	N/A			
5.	Does this camera have any other camera specific or software related features such as Automatic Number Plate Recognition, Facial Recognition, movement analysis?	Yes		No	X
5a.	If yes; What software/function?	N/A			
5b.	What is the purpose of having/installing this function or software?	N/A			
5c.	What measures are in place to protect privacy when using this function/software?	N/A			
6.	Do the cameras have the capacity to record personal information.	Yes	X	No	
6a.	If yes, please explain what and why?	Cameras are HD resolution and should the zoom function be used by the operator then			

		the camera would be able to record personal information such as on peoples mobile phones or any written documentation that was displayed, however this is addressed within our CCTV Code of Practice and all staff are aware of disciplinary action to be taken should misuse of cameras be identified.			
7.	Is there any chance of this footage being released in the public domain?	Yes	X	No	
7a.	If yes, explain why and what are the controls in place?	Subject Access Requests (SAR) are managed by Magenta Living's Data Controller and only accepted when all other options have been exhausted and where required by law. All efforts will be made to ensure personal or private information is obscured from view on any footage released. Police footage requests are also managed by the Data Controller and are again only released when necessary and with any personal or private information obscured from view.			
8.	Is there a General Data Protection Regulation compliant sign clearly displayed in close proximity of the camera to make people aware that CCTV is in operation ?	Yes	X	No	
9.	Does the camera cover any part of any property where there is an expectation of privacy ?	Yes	X	No	
9a.	If yes what is covered?	Some Magenta Living properties, including front gardens will be viewed by the cameras. Public footpaths and roads, used by members of the public, will also be viewable from the cameras.			
9b.	What measures have been taken to prevent observation of these areas?	Privacy zones will be in place for all private areas on properties and cannot be altered or removed by CCTV operators. Code of Practice highlights disciplinary action to be taken should any CCTV operator attempt to observe anything that would not be in line with their role.			
10.	Does any additional action need to be taken to reduce the impact on privacy by these cameras?	Yes		No	X

6 Camera Specific – POST Installation

1.	Has the purpose of the camera(s) been reviewed? Date of review :	Yes		No	
1a.	What was the outcome of the review ?				
2.	Has Magenta Living ever received a complaint relating to the impact on privacy by this camera?	Yes		No	
2a.	Please give details of the source and nature of the complaint and the				

	outcome.	
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Action to be taken	Responsibility of	By when	Status	Completed date

Assessor

Signature: _____ **Date:** _____

Print Name: _____ **Title:** _____

Manager

Signature: _____ **Date:** _____

Print Name: _____

Review date : _____