



HARTLEY PLACE, SUTTON WAY, ELLESMERE PORT, CH65 7DJ  
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](mailto:paulrobinson@magentaliving.org.uk)  
Telephone: 0151 666 7165 / 07713415984

### 3. Location of cameras :

Cameras will be located across Hartley Place, both internally and externally and will include :

- 8 x Hikvision **DS2CD2126G2ISU28** Hikvision DS-2CD2126G2-ISU Pro Series AcuSense IP67 2MP IR 30M IP Dome Camera, 2.8mm Fixed Lens, White

- 1 x Hikvision **DS-2DF8225IX-AEL(T5)** Hikvision DS-2DF8225IX-AEL Ultra Series DarkFighter 2MP IR 25x Optical Zoom Dome IP Camera, 5.7-142.5mm Motorized Varifocal Lens,
- 1 x Analogue Hikvision Lift Cameras **DS2CE56D8TVPITF28** Pro Series 2MP Ultra Low Light 30m IR HDoC Dome Camera,
- 2 x HIKVISION 1/3 CMOS lens IP67 Vandal Resistant Metal, POE powered 4MP Fixed IP Dome camera

#### 4. Camera Specific - Prior to INSTALLATION

1.	Why is a camera being considered for installation ?	<p>Hartley Place is a four storey extra care scheme consisting of fifty three over 55yrs age designated apartments. This is an independent living scheme with on-site care team based at the location 24/7. There is also two onsite Magenta Living staff based there during office hours Monday to Friday.</p> <p>The external of the building and grounds are covered by CCTV, with further CCTV covering the internal areas of reception, scooter store and lifts, for the safety and security of customers, visitors and colleagues. Access to the building is via a fob or concierge service, however individuals have been identified gaining access by calling a tenant and requesting access or tailgating tenants as they enter the building. Hartley Place is located in close proximity to a busy shopping area which has regular issues with youths loitering and engaging in Anti Social Behaviour (ASB) at different times of the day and night. There has been several occasions where youths have ventured to Hartley Place and carried out ASB, whilst tenants are present, causing disturbances in the early hours of the morning as these vulnerable tenants are resting. Magenta Living has made numerous attempts to tackle such behaviour including increasing security patrols at the location and working with Merseyside Police to identify and prosecute individuals, however incidents of ASB 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</p>
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		creating a long term, sustainable community.			
2.	Has there been consultation before the camera was installed?	Yes		No	x
2a.	If yes, what was the outcome of the consultation?				
2b.	If no, why wasn't it undertaken ?	CCTV camera's were installed whilst the building was being constructed. All tenants who were and are successful when applying for a property are made aware of CCTV being present at the premises. Signs clearly indicating who is responsible for the monitoring of CCTV are visible throughout the building.			

### 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 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?	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 :25.04.2023	Yes	x	No	
1a.	What was the outcome of the review ?	All cameras are being used effectively to address issues highlighted above. There are no obvious and unnecessary breaches of an individuals privacy.			
2.	Has Magenta Living ever received a complaint relating to the impact on privacy by this camera?	Yes		No	x
2a.	Please give details of the source and nature of the complaint and the outcome.				

Action to be taken	Responsibility of	By when	Status	Completed date

**Assessor**

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Print Name:** \_\_\_\_\_ **Title:** \_\_\_\_\_

**Manager**

**Signature:** \_\_\_\_\_ **Date:**

**Print Name:**

**Review date :**