

# **Appendix A- Privacy Impact Assessment – CCTV at the Eric Payne Community Centre and Jubilee Fields, St Faiths Road, Alcester**

Note: This PIA follows the Information Commissioner's Office Code of Practice for conducting privacy impact assessments (code of practice 20140225 Version: 1.0)

## **Overview of Project**

The Eric Payne Community Centre and Jubilee Fields are owned and managed by Alcester Town Council.

The Centre is managed on a day to day basis by the Office Administrator reporting to the Finance & General Purposes Committee.

The Eric Payne Community Centre and Jubilee Fields are open to the public therefore the Town Council has responsibility for protection of privacy to the people of Alcester as a relevant authority under the Protection of Freedoms Act 2012 in accordance with the ICO Code of Practice.

The CCTV system seeks to prevent and detect crime on the fields and buildings. It consists of 7 CCTV cameras and a DVR. The camera positions are identified in Appendix 1. The purpose of recording images is to prevent crime and to detect it where prevention has failed.

The system captures images of the car park, access and fields surrounding the Eric Payne Community Centre. Images are recorded on a DVR located in a locked room in the Centre. Images are only accessible through the DVR system using a password or by remote access from the Town Council's offices.

## **System Operator**

The System Operator is Alcester Town Council.

## **System Users**

The System Users are the Town Clerk and the Office Administrator.

## **Project Aims and Benefits**

The Project aims are:

- To prevent crime and where necessary detect it
- To provide secure footage of detected crimes in order that they can be reported to, and investigated by, Warwickshire Police

The benefits to the Town Council are:

- Crime is deterred by the presence of CCTV and signage
- Crime is detected where prevention fails and action can be taken to ensure that the property is safe and secure for use by the inhabitants of Alcester and the surrounding area

The benefits to other parties are:

Crime is detected and images recorded in order to assist Warwickshire Police with any investigations.

The inhabitants of Alcester and the surrounding area feel able to use the Eric Payne Community Centre and Jubilee Fields safely and securely.

### **Need Identified**

The site consists of a large car park, the Eric Payne Community Centre, MUGA, youth shelter, skate park and children's play area. Crime has been reported on a regular basis. Most crime is petty but there is regular evidence of vandalism.

The Fields are open to the public at all times. The Centre is open 7 days a week depending on bookings.

### **Other options apart from CCTV**

The car park is lit until 10.30 pm and alternative strategies such as increased lighting have been discounted as not being appropriate to a residential area or likely to be effective.

### **Consultation**

As a result of ongoing anti-social behaviour, petty crime and security issues, the Town Council agreed that further crime prevention and detection measures were appropriate for the site.

### **Information Flows**

Information from the 7 cameras is continuously recorded on the DVR located in the loft at the Eric Payne Community Centre. Footage is kept until the system overwrites previous information as it is set on a continuous loop which lasts for 30 days. In the event of crime being reported the footage is reviewed by an authorised Officer of the Town Council.

Information is accessed via the DVR on site or through remote access using secure communications through the internet.

All visitors to the Eric Payne Community Centre and Jubilee Fields who proceed through the areas covered by CCTV (see Appendix 1) are affected as images of them are recorded. The system stores high quality images only – sound is not recorded.

The cameras are positioned and aimed so that only information about individuals and vehicles using the Eric Payne Community Centre and Jubilee Fields are captured and that anyone outside the park is not identifiable on the system. The camera does record images of vehicles and people approaching the Centre on the access road off St Faith's Road.

Individuals are informed about the scheme by signage erected in the area covered by the cameras. The contact details of the Town Council as the scheme operator will be clearly displayed as will the purpose of the scheme – the prevention and detection of crime.

Personal data will only be recorded for the purposes of the prevention and detection of crime and will not be used for any other purposes. The only data that will be recorded will be video footage of people using the Centre and fields.

Personal data will not be provided to any other body save for the investigation of crime by Warwickshire Police.

## **Risks**

The key risk associated with the project is that personal information in the form of video footage will be used for purposes other than the objectives of the project – the prevention and detection of crime at the Centre and on Jubilee Fields.

## **Mitigation/Privacy Solutions**

The risk is mitigated by limiting access to the data to authorised persons and ensuring that the data is only provided to Warwickshire Police for the investigation of crime. Any requests for data to be used in other ways will be denied.

Data is kept under secure conditions – physical security (locked room in a locked building) and software security (password protected software to access video footage). Further, the deletion of data on a rolling 30 day recording means that images recorded more than 30 days ago will be routinely overwritten.

## **Conclusion**

The Town Council believes that this PIA demonstrates that the CCTV project represents an appropriate response to ongoing crime and security issues at the Eric Payne Community Centre and Jubilee Fields. This PIA has identified the risks and proposed mitigation or privacy solutions that protect the public whilst ensuring that the CCTV scheme can achieve its objectives.

## **Review**

This PIA is to be reviewed annually by the Town Council.