

**KINVER PARISH COUNCIL  
 PRIVACY IMPACT ASSESSMENT  
 CCTV OVERLOOKING CAR PARK SPACES AND PLAY AREA-  
 KSCA, LEGION DRIVE, KINVER**

**1. Is there a need for a PIA?**

CCTV overlooking the children’s play area has been in situ for a number of years. Following an arson attack on a piece of equipment it was decided to upgrade/ modernise the CCTV. The CCTV camera is affixed to the side of the KSCA building and is focused on the breadth of the play area and 10 car parking spaces. The car park is licensed (during day time hours) to the parish council by the KSCA.

The purpose of the CCTV is to deter crime, help identify (and bring to justice) perpetrators of crime and to reassure the public.

The CCTV system chosen has a high definition camera and has a zoom and infra- red feature capable of capturing images in darkness. In this respect the system is capable of capturing new and more detailed personal data – the identities of people.

Images captured may be passed to the police if a crime is suspected. Images may be used by the parish council to identify people so that claims for compensation can be brought should there be an incident of criminal damage.

It is therefore felt that a full PIA is required to best inform the parish council as to how to comply with the Data Protection Act 1998.

**2. In what way does the personal data (information) flow?**

The system records all of the time. It captures the personal data of children and their parents/ carers as well as drivers and other occupants of cars and people in the vicinity of the car parking area and the play area. It is impossible to say how many people can be recorded by the system at any one time as it depends on how busy the area is. The system stores images for 30 days. After that time period the images are ‘overwritten’ by new images. As such at the end of 30 days the personal data is erased.

**Do we need to consult?**

It is the view of the parish council that there is no need to consult with users of the play area etc. As outlined above the CCTV is not new and there are signs in the vicinity explaining that CCTV is in operation. Whilst images of people going about their ordinary business are recorded this is a public area so there is less expectation of privacy- indeed the presence of CCTV is welcomed by the community.

**3. What are the privacy and related risks?**

<b>Privacy issue</b>	<b>Risk to individuals</b>	<b>Council risk</b>	<b>Compliance risk</b>
<b>People unaware that images are captured</b>	<b>Invasion of privacy</b>	<b>Breach of data protection principle – may lead to involvement of ICO.</b>	<b>Unable to meet principle</b>
<b>Retaining for longer than needed</b>	<b>Unjustifiable access to/ disclosure of images</b>	<b>As above</b>	<b>As above</b>
<b>Unauthorised access to images stored on the system</b>	<b>Images being viewed without justification</b>	<b>As above</b>	<b>As above</b>
<b>Inappropriate sharing (disclosure) of images</b>	<b>As above</b>	<b>As above</b>	<b>As above</b>

#### 4. Solutions

<b>Risk</b>	<b>Solution(s)</b>	<b>Result</b>	<b>Evaluation</b>
<b>Lack of awareness</b>	<b>Privacy Notice</b>	<b>Risk reduced</b>	<b>Acceptable</b>
<b>Images retained unnecessarily</b>	<b>System set to automatically over write after 30 days</b>	<b>Risk eliminated</b>	<b>Acceptable</b>
<b>Unauthorised access</b>	<b>Only a limited number of people allowed access to the system. Door locked.</b>	<b>Risk reduced</b>	<b>Acceptable</b>
<b>Inappropriate disclosure</b>	<b>Form to be completed by police or KSCA etc. if access is required. Disclosure to be justified.</b>	<b>Risk reduced</b>	<b>Acceptable</b>

#### 5. Sign off

<b>Risk</b>	<b>Approved Solution</b>	<b>Approved by:</b>
<b>Unawareness</b>	<b>As above</b>	<b>Jenny Spaul</b>
<b>Excessive retention</b>	<b>As above</b>	<b>As above</b>
<b>Unauthorised access</b>	<b>As above</b>	<b>As above</b>
<b>Improper disclosure</b>	<b>As above</b>	<b>As above</b>

#### 6. Responsibilities

<b>Action to be taken</b>	<b>Completion date</b>	<b>Responsibility</b>
<b>Signage</b>	<b>31/7/17</b>	<b>Jenny Spaul</b>
<b>Policy re who has access to images</b>	<b>31/7/17</b>	<b>Jenny Spaul</b>
<b>Policy re disclosure/ preparation of request form.</b>	<b>31/7/17</b>	<b>Jenny Spaul</b>

**Contact point for future concerns: Jenny Spaul**

# CCTV

CCTV is in operation.

The aim of the system is to deter crime, assist any criminal investigation and to provide reassurance to the public. The system is controlled by Kinver Parish Council who can be contacted at 95 High Street, Kinver DY7 6HD. The Council operates the system in the public interest. The Council may share any images captured with the Police or representatives of the KSCA if a crime is suspected or a claim for compensation arises. Images are generally retained for 30 days when they are automatically erased.

You have the right to request a copy of your personal data, for the same to be erased or for its use to be restricted. Please contact the Clerk to the Council at the above address if you have any questions regarding the system or you wish to exercise any of these rights.

If you have any concerns about the operation of the system then you have the right to complain to the Information Commissioner who can be contacted at Wycliffe House, Water Lane, Wilmslow SK9 5AF. [www.ico.org.uk](http://www.ico.org.uk)

## Personal Data Request Form

### Introduction:

By law you can ask for copies of paper and computer records that we hold, share or use about you. In order to deal with your request we can ask for proof of identity, a £10 fee (until 25 May 2018) and enough information to enable us to locate the personal data that you request.

Please complete this form and return it to us with proof of your identity and the fee to The Parish Council Offices, 95 High Street, Kinver. We will acknowledge safe receipt and respond within 40 days.

### Part 1: Person that the request relates to (the data subject)

Title: Mr / Mrs / Miss / Ms / Other

Surname:

Forenames:

Any other names that you are known by that may assist in the search:

Address:

Postcode:

Telephone:

E-mail:

Date of birth:

### Part 2: Proof of identity and fee

To help us establish your identity your application must be accompanied by **two** pieces of identification that between them clearly show your name, date of birth and current address. Please enclose a copy of one of the following as proof of identity: passport or photo card driving licence, birth or adoption certificate and a copy of a bank statement or utility bill dated within the last three months.

This is to ensure that we only provide information to a person who is entitled to receive it. If none of these documents are available, please contact the Clerk to the Council for advice on other acceptable forms of identification.

Please also enclose a cheque for £10 made payable to Kinver Parish Council or cash. If you wish to pay by another method please contact the Clerk.

**Part 3: Information requested**

To help us to deal with your request quickly and efficiently please provide as much detail as possible about the information you seek. Please include time frames, dates, names or types of documents, any file reference and any other information that may enable us to locate your data, for example, for e-mails, the names of senders and recipients and approximate dates.

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Please continue on a separate sheet of paper, if necessary.

**DECLARATION**

I, \_\_\_\_\_, [print name] confirm that the information provided on this form is correct and that I am the data subject whose name appears on this form. I understand that Kinver Parish Council must confirm proof of identity and that it may be necessary for them to contact me again for further information to locate the personal data I seek.

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

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<b>Request for Kinver Parish Council to disclose CCTV footage</b>	<b>Form to be returned to the Clerk to the Council</b>
Name of Person requesting:	
Organisation:	
Position within organisation:	
Personal data (images) sought:	
Purpose of request	
Principle/ exemption relied upon (legal basis for request)	
Date of request	
Date required by:	
<b>If</b> disclosure made will the data be processed in accordance with the principles of the DPA?	Yes/ No
<b>If</b> disclosure made what proposals are there for retention or disposal of data:	
Signed:	
Dated:	