


Caerphilly County Borough Council

Data Protection Impact Assessment Form

Location:	Penllwyn – Camera 49	Ref:	PERM072
Assessment Carried out By:	Carl Nesling	Title:	Control Room Manager
Date of Assessment:	14/03/19		

This checklist should ideally be carried out prior to technical planning and installation of a CCTV system. This system should be reviewed annually using the appropriate review checklist.

For what purpose(s) will the CCTV be used	<p>CCTV is used in accordance with Scheme objectives</p> <p>The key objectives of the <u>Scheme</u> are:</p> <p>To preserve life and to minimise the risk and danger to the vulnerable through effective CCTV monitoring.</p> <p>To assist in the detection of crime.</p> <p>To facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order.</p> <p>To assist in the restoration of tranquillity and reduction in anti-social behaviour.</p> <p>To prevent or mitigate interruptions to traffic flow (not to enforce breaches of the traffic law).</p> <p>To assist in the reduction of the fear of crime and anti-social behaviour thereby promoting the reassurance of the communities affected and promoting community regeneration throughout the region.</p>
What are the benefits it is intended to address	It is intended to benefit the residents, visitors and businesses of Penllwyn in dealing with issues identified in the scheme objectives.
What are the benefits to be gained from its use	The primary objective of the Scheme is to provide a safe environment for the benefit of those who live, work, trade, visit, serve and enjoy the facilities within the areas covered by Caerphilly County Borough Council
Can less privacy intrusive solutions (e.g. improved lighting) achieve the same objective	Sufficient Street Lighting in the area both to benefit the users and assist in improving the quality of CCTV. No other long term solution is available to provide the coverage in both area and length of time, is available.
Do you need images of identifiable individuals or could the scheme use other images not capable of identifying individuals	<p>The Scheme Owners will maintain policies and procedures to meet the requirements of</p> <p>BS 7958: 2015</p> <p><u>BS 7499: 2013</u> (Relevant Sections)</p> <p><u>BS 7858:2012</u></p> <p>Information Commissionaires CCTV Code of Practice</p> <p>Regulation of the Investigatory Powers Act (<u>RIPA</u>)</p> <p>Human Rights Act</p> <p>Health & Safety at Work Act (<u>HSW</u>)</p> <p>Equal Opportunities Act</p> <p>Home Office Surveillance Camera Code of Practice</p> <p>Surveillance Camera Commissionaires Code of</p>

	Practice. Images of persons are needed to be able to identify any person who commits any breaches of the scheme objectives and can be used by relevant prosecuting authorities.
Will the particular equipment / system being considered deliver the desired benefits now and remain suitable in the future	The system is able to provide high quality images and the desired benefits needed to produce evidence sufficient for use by prosecuting authorities. System is modernised and updated to ensure continued high quality imagery produced.
What (if any) future demands may arise for wider use of images and how will you address these?	The main town centre area is covered. Unlikely to have any permanent extensions to current system.
What are the views of those individuals (if any) who will be under surveillance	Please see appendix 1
What could you do to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed	Management system records all actions of operators allowing for audits of camera patrols plus privacy blocks on cameras to exclude any intrusion on private space.
Is appropriate signage informing individuals of the camera in place (if required)?	Signage installed on all roads and public entries into the relevant area along with signage within the area.
Proposed time period for installation of the CCTV	System already in place since 2000. PIA carried out in accordance with Surveillance Camera Commissionaires Code of Practice.
This section to be completed by the Data Controller / Head of Service	
Is the proposed system in accordance with the law? (Primarily the Data Protection Act and Human Rights Act)	Yes the proposed system operates in accordance with the law, British Standards and relevant Codes of Practice
Is it necessary to address a pressing need, such as public safety or crime prevention?	Yes as supported by the incidents monitored etc. and responses of consultees. The cameras assist in public safety, assurance, crime prevention and antisocial behaviour issues.
Is it justified in the circumstances	Yes
Is it appropriate to the problem that it is designed to deal with	Yes
Approved by Nominated Person (signature)	J Morgan
Date: 27.3.19	Signed: 

Hi

The Surveillance Camera Commissioner has put a responsibility on Local Authorities to justify any deployment of surveillance cameras via a Data Protection Impact Assessment (Previously Privacy Impact Assessment - P.I.A). Such assessments are now required before deploying any new cameras and for assessing the continuing need for existing cameras. PIA's consider whether there is a justified need for the deployment of cameras, for example serious, frequent antisocial behaviour. It also considers the impact on those subjected to the surveillance, whether such actions are proportionate to the problem they aim to address and if other less intrusive measures have been considered e.g., improved lighting, gating, warden patrols, increased police patrols etc.

The system at Penllwyn is due for a review and I am contacting all relevant / interested parties for their views on CCTV to enable us to make an assessment on the continued use of CCTV. Attached are some statistical information for your area in previous 10 months 01/04/18 to 28/02/19.

Under General Data Protection Regulations 2016 and Data Protection Act 2018 we need to make you aware with how we will deal with your data. Your comments will be published as the DPIA is published document on the CCBC website under the CCTV section. Email addresses and phone numbers will be removed.

CCTV Control Room – Penllwyn

2098 targeted CCTV patrols carried out by operators

4 incidents monitored by CCTV not requiring police attendance

Police.uk website

For period 01/04/18 to 31/01/19 there were 213 recorded incidents in the Penllwyn area and 14 recorded incidents in or near the area of the cameras.

I would appreciate if you could confirm by return email your views on the requirement for CCTV and giving reasons why you believe it should or should not continue.

Thanks

Carl Nesling

Rheolwr Ystafell Reoli | Control Room Manager

Cyngor Bwrdeistref Sirol Caerffili | Caerphilly County Borough Council

Carl,

I feel that the statistics provided by you already show that there is a need for CCTV to continue to be provided in the Penllwyn area.

I would definitely support a case for keeping CCTV cameras in the Penllwyn area for the following reasons:-

The cameras within the Penllwyn area cover a variety of Licensed retail premises and Fast Food outlets, which can all be places where Antisocial Behaviour /Crime can occur.

We must also not forget that CCTV camera coverage not only helps to protect the members of the public, also importantly it helps to protect "The Protectors" – (Community Safety Wardens and our colleagues in the Police; Ambulance and Fire Services and Street Pastors to name but a few).

With all services facing cuts in resources very often lone officers are called to incidents and CCTV coverage helps with their safety and protection by being able to monitor live incidents and for requests for additional resources to be passed on quickly to the relevant agencies.

As we all know, in many incidents CCTV footage has been vital in providing essential evidence to help obtain successful prosecutions at court

Indeed, in many cases there would be no successful prosecution without the CCTV evidence.

I feel that all of the above mentioned provide very valid reasons for keeping the CCTV camera network in the Penllwyn area.

Regards,

Alan Davies

Community Safety Warden107

I fully support Warden Davies's response.

ASB in the vicinity of the Penllwyn Circle has in the past included youths throwing stones at and breaking the windows on passing Stagecoach buses, resulting in the no. 9 service's suspension – this denied Penllwyn residents living at the top of the Penllwyn public transport to/from Blackwood. The presence of CCTV at the Circle provides a deterrent to ASB, and provides assurance to Stagecoach drivers and passengers that ASB perpetrators may be identified and brought to book.

Gez

Cllr. Gez Kirby

County Councillor - Pontllanfraith | Cynghorydd Sir - Pontllanfraith
Caerphilly County Borough Council | Cyngor Bwrdeistref Sirol Caerffili

Hi Carl,

The CCTV is paramount to the safety of the community and detection of crime in the Penllwyn. We as the Penllwyn Community Partnership have looked for additional funding from the PCC to be able to add to the CCTV and a Skate Park in the area due to current issues in the Penllwyn regarding ASB and children playing on a dangerous round about. Unfortunately this was refused on the grounds that it is not a statutory obligation of CCBC.

There has also been a number of issues on The Circle where the current CCTV is placed. The CCTV has helped to reduce and identify suspects and it is imperative that it stays.

Should you require anything further please let me know.

Kind Regards

Anna

Penllwyn Partnership