

JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT

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 minimised 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 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.

**JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT**

1.5 'Personal data' as defined by Section of the Data Protection Act 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 Hertfordshire CCTV Partnership 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

2.2 CCTV recording equipment is contained within an additional secure storage area within the CCTV Control 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 Data Protection Act, 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) and generator these are programmed to maintain a power supply to essential equipment in the event of total power failure.

**JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT**

RESPONSIBLE PERSON CONTACT DETAILS

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

Name: Julie Sunderland

Title: Practice Manager

Organisation: Junction Surgery Ltd

Email: Julie.,Sunderland@gp-b85660.nhs.uk

Telephone: 01484411827

**JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT**

External - Dual CCD Camera's with built-in Infrared Sensors, Internal- High Resolution Colour Mini Dome Cameras

Location:-	Camera Numbers:-
External –rear entrance	7
External – rear car park	8
External – side gate	9
External – front entrance	6
Internal – staff corridor	5
Internal – 1 st floor corridor	4
Internal – ground floor corridor	3
Internal - reception	2
Internal – waiting room	1

<p>Camera Specific - Prior to INSTALLATION</p> <p>1 Why is a camera being considered for installation?</p> <p>2. Has there been consultation before the camera was installed?</p> <p>2b If yes, what was the outcome of the consultation?</p> <p>2a If no, why wasn't it undertaken?</p> <p>5 Camera Specific – Prior to INSTALLATION & REVIEW</p> <p>3 What type of camera is being considered or in place?</p>	<p>To protect the staff and property of Junction Surgery Ltd</p> <p>No</p> <p>N/A</p> <p>Camera's installed prior to taking over the practice.</p> <p>N/A</p>
--	---

**JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT**

4 Is audio recording an available feature of this camera?	No
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?	No N/A
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?	No
6 Do the cameras have the capacity to record personal information.	N/A
6a If yes, please explain what and why?	Yes
7 Is there any chance of this footage Being released in the public domain?	Only available to police and courts to be used as evidence for a crime that has been committed.
7a If yes, explain why and what are the controls in place?	Yes
8 Is there a Data Protection Act compliant sign clearly displayed in close proximity of the camera to make people aware that CCTV is in operation?	No

**JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT**

9 Does the camera cover any part of any property where there is an expectation of privacy?	N/A
9a If yes what is covered?	N/A
9b What measures have been taken to prevent observation of these areas?	N/A
10 Does any additional action need to be taken to reduce the impact on privacy by this camera?	
6 Camera Specific – POST Installation	Yes
1 Has the purpose of the camera(s) been reviewed? Date:- 9.5.2018	Camera's appropriate for use.
1a What was the outcome of the Review?	No
2 Has the Council every received a complaint relating to the impact on privacy by this camera?	N/A
2a Please give details of the source and nature of the complaint and the outcome.	N/A
Action to be taken	N/A
Responsibility of	N/A
By	N/A

**JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT**

When	N/A
Status Completed	N/A
Date	N/A
Assessor Signature: _____ Date: _____	
Print Name: _____ Title: _____	
Manager Signature: _____ Date: _____	
Print Name: _____ Title: _____	
Review Date:- June 2020	

**JUNCTION SURGERY LTD
CCTV PRIVACY IMPACT ASSESSMENT**