



Okehampton Town Council

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Body Worn CCTV Privacy Impact Statement

Purpose of the Report

The purpose of this report is primarily to minimise the risk of informational privacy – the risk of harm through use or misuse of information gathered through the use of the Council’s Body Worn CCTV system.

Introduction

Using CCTV can be privacy intrusive because it is capable of putting law-abiding members of the public under surveillance and recording their movements as they go about their day to day lawful activities. Careful consideration should be used whether to use it or not. The authority should take into account what benefits can be gained, whether better solutions exist and what effect it may have on individuals.

Okehampton Town Council considers these matters objectively as part of an assessment of the schemes impact on people’s privacy.

Impact Assessment

Okehampton Town Council owns and operates a Body Worn CCTV system utilised by employees working in Simmons Park and open spaces owned or the responsibility of the Council.

Assessment Date: March 2020
Review Date: March 2022
Undertaken by: Emma James, Town Clerk

<p>What organisations will be using the CCTV images? Who will take responsibility under the Data Protection Act?</p>	<p>Okehampton Town Council, Devon & Cornwall Police and West Devon Borough Council (WDBC) will be the exclusive users of the system.</p> <p>Okehampton Town Council will be the Data Controller at the point of images being recorded. However, if these images are seized/passed to Devon & Cornwall Police, WDBC, or any other statutory body, then the legal responsibility will be transferred to that body as the data controller for those images.</p>
<p>What is the organisations purpose for using CCTV? What are the issues that the system aims to address?</p>	<p>The Council’s employees who work in outdoor spaces that are owned by or the responsibility of the Council have recently been subjected to verbal and physical abuse as part of an increase in anti-social behaviour in the town.</p> <p>The purpose for the use of body-worn CCTV is to reduce the likelihood of confrontational situations and to ensure the</p>

	health, safety and wellbeing of employees, address public safety concerns and the capture of evidence of any crime in progress that employees may come across; for example vandalism or assault on others. The devices may also be used to capture evidence of persons who refuse on request to pick up their dog waste or to keep their dog under control (subject to agreement with WDBC).
What are the benefits to be gained from using CCTV?	Using CCTV can significantly reduce crime and is reported by other local Councils to have had a positive effect by reducing abuse aimed at employees.
Can CCTV realistically deliver these benefits?	Yes, as reported by other local Councils
Can less privacy-intrusive solutions, such as improved lighting, achieve the same objectives?	The body worn CCTV system has been implemented specifically for the reasons stated and to provide a vital tool in the prevention of the occurrence of incidents. No other tool can be utilised in such a way for this purpose.
Do you need identifiable images of individuals, or could the scheme use other images not capable of identifying the individual?	It is of paramount importance that the system is capable of identifying individuals. Footage from the system may be used by the police and if the persons were not identifiable then the system would not be fit for purpose.
Will the particular equipment/system of work being considered deliver the desired benefits now and remain suitable in the future?	The Council's method of work is unlikely to change and will continue to use this method to aid in the reduction of the likelihood of confrontational situations and to ensure the health, safety and wellbeing of employees, and public safety.
What future demands may arise for wider use of images and how will you address these?	Legislation changes overtime and the Council will comply with future regulations as they arise. The Council is also considering the use of a fixed CCTV system covering the town centre and Simmons Park. Such a system would be installed with input and guidance from Devon & Cornwall Police with any monitoring and recording being undertaken at a specialised monitoring hub.
What are the views of those under surveillance?	The Council has not undertaken a full public consultation process, but those persons that are aware that the Council is implementing this system are happy to be in an area that is monitored. These persons include members of the public who have raised concerns about anti-social behaviour, Okehampton College and local police. By abiding with legislation and Council policy the system will only be used in confrontational circumstances.
What could we do to minimise intrusion for	As the system is body worn it is only set to record when employees are in, or in fear of, a confrontational situation.

<p>those that may be monitored, particularly if specific concerns have been expressed? Is the system established on a proper legal basis and operated in accordance with the law?</p>	<p>The system has been established on a proper and legal basis as set out in policy.</p>
<p>Is it necessary to address a pressing need, such as public safety, crime prevention or national security?</p>	<p>Incidents of anti-social behaviour increased significantly during 2019 and continues, although on a less intense scale. Use of this system will help to ensure the health, safety and wellbeing of employees and address public safety concerns of those using the Council facilities as well as the capture of evidence of any crime in progress that employees may come across; for example vandalism or assault on others.</p>
<p>Is it justified in the circumstances?</p>	<p>Yes</p>
<p>Is it proportionate to the problem that it is designed to deal with?</p>	<p>Yes. It is to be used to ensure safety of employees and members of the public and complies with current legislation.</p>