

# **WEST LAVINGTON PARISH COUNCIL**

## **REPORT OF**

### **PRIVACY IMPACT ASSESSMENT**

#### **ON SURVEILLANCE CAMERA SYSTEM (CCTV)**

#### **AT WEST LAVINGTON VILLAGE HALL & RECREATION GROUND**

#### **Location of surveillance cameras**

The installation will consist of 5 high definition cameras fixed to the Village Hall and Youth Club soffit and positioned to cover the perimeter of the building. A further long range high definition camera fixed at high level on the Village Hall will focus on the far eastern end of the playing fields in the vicinity of the location of the BMX track and shelter, a distance of 200 yards. All the cameras will have built-in infra-red ability for night-time usage. An 8 channel recorder will be situated within a designated secure cupboard, protected by a separate but dedicated security coded intruder alarm.

#### **Issues the system is seeking to address**

The Village Hall (including the attached Youth Club building and immediate surrounding area) was the location for sustained vandalism and anti-social behaviour (ASB) between June and December 2016. There were in the region of 25 occasions when damage to the hall and parish council equipment was caused, or nuisance reported. Many of these instances were of a serious nature including two fires, and entailed some costly repairs such as replacement of tiles ripped from the hall roof (see Appendix 1 for instances of vandalism and ASB experienced and Appendix 2 for some examples of significant costs and time incurred in dealing with incidents).

There was also evidence that some drug activity was taking place at the far eastern end of the recreation ground where drug paraphernalia was found.

Residents of West Lavington living in the immediate vicinity were encouraged to report these incidents by dialling 101 or, if an incident was occurring, 999. A letter from the Chairman of the Parish Council was circulated to all households in the vicinity (see Appendix 3). However, despite frequent calls and many police visits, patrols and enquiries over the seven month period, the perpetrators were never identified or caught and the pattern of unacceptable behaviour persisted. The latest act of vandalism, destroyed guttering pipe discovered broken in two and lying on the ground at the back of the hall in the second week of January 2018, raises renewed concern.

#### **Benefits to be gained from installing surveillance cameras**

Surveillance systems can be privacy intrusive and place law-abiding people under surveillance as well as recording their movements as they go about their daily activities. Therefore, West Lavington Parish Council has given serious consideration, and has not rushed, to the decision that CCTV at the Village Hall is the only solution likely to achieve the short, medium and long-term results sought (i.e. elimination of vandalism, ASB, drug dealing and other criminal activities at the centre of the village or, failing that, identification of perpetrators). Other strategies including more and brighter lighting

around the hall at night and volunteer patrols have been considered, but these were finally dropped when it became apparent that, unless the police were able to arrive in time to witness an actual event occurring, or members of the public who reported incidents were able or willing to identify those involved, success in identifying perpetrators or eliminating their criminal behaviour was unlikely.

Support for surveillance equipment increased when the police (who had recommended installation of CCTV at the hall) installed their own CCTV camera for a temporary trial period of 3 months at the beginning of 2017. The result was highly effective. Although a spate of this behaviour was recorded when the camera was removed - a drain pipe ripped off and deposited in the children's playground, earth dug up to build an unauthorised extra height jump on the BMX track, log stepping stumps in Robert's playground chipped away, fly tipping of a cooker in the vicinity of the track and littering - no instances of vandalism or ASB occurred during the 3 month trial. Following this successful police trial, councillors agreed that types of systems and costs should be investigated.

### **Success measured - who will benefit and how by the absence of vandalism and ASB?**

The Village Hall is used by West Lavington Parish residents (population c. 1500) for community events, celebrations and parish council and other organisations' meetings and by non-residents who hire the hall or train and play football on the recreation ground pitches provided free of charge by the parish council. The recreation ground and the toddlers' playground immediately adjacent to the Village Hall are frequented by walkers and parents and children. Lavington Pre-school and Dauntsey Academy Primary School are located on the eastern side of the recreation ground's perimeter fence adjacent to the BMX track and shelter. The Village Hall car park is used by parents/carers to drop off children for school and collect them.

Residents of the surrounding area include 19 elderly residents of sheltered housing at Hedges House, 72 adults plus children in Sandfield, 12 adults plus children in Newby Close and 23 adults, mostly elderly, in The Spinney.

Should elimination of crime, such as acts of vandalism, ABS and drug misuse in and around the Village Hall facilities be achieved:

- The area will in the future be free of crime and the fear of it
- The well-being of individuals residing in the vicinity and those using the Village Hall and recreation ground facilities will be improved and they will feel secure
- Children will not witness damage and debris
- Families using the community facilities will not be exposed to drug dealers and detritus
- Noise and disturbance late at night will not occur
- The Village Hall and Youth Club will be protected
- Costs of repairs and clean-up, and volunteers' time and efforts in arranging both, will be eliminated
- Calls to the police and the need for police attention will be eliminated.

### **What privacy issues may arise from the surveillance camera system?**

It is intended that cameras will be situated in the soffit of the Village Hall and Youth Club around their perimeter as well as at a high level to focus on the area around the BMX track and shelter, 200 yards to the east of the hall. Although the purpose is to prevent and deter crime and anti-social behaviour in these areas and to record any suspects' behaviour, images of law-abiding individuals accessing these locations may also be captured. To minimise any potential obtrusive effect on law abiding citizens, consideration will be given in sensitive cases to whether identifying features of any individuals in the images collected need to be obscured or whether the privacy intrusion will be minimal and obscuring images will not be required. Deletion of the images will take place in accordance with the council's retention policy regarding CCTV image collection.

With regard to areas not intended to be the subject of surveillance aimed at detecting and deterring crime and anti-social behaviour, cameras will be positioned to ensure that they do not view and collect images in these locations, e.g. the gardens, front doors, living rooms of private residences. Should capture of images in these areas inadvertently occur, no use or disclosures of them will be made nor will they be passed to any third party, unless potential criminal behaviour is detected or there is an overriding legal obligation. They will be deleted in accordance with the council's retention policy regarding CCTV image collection.

In instances involving damage caused by inaccurate data or a security breach, or upset caused by unnecessary intrusion on privacy (including where images have incorrectly been passed to a law enforcement body) damage to the council's reputation or loss of public trust may occur. In addition, legal compliance risks may arise, such as a data breach or a legal compliance failure. Occurrences of such risks should be low however and mitigated by close adherence to policies and procedures, training of operators, information sufficiently protected etc.

### **Retention of personal data**

Periods of retention of personal data are intended to reflect the parish council's purpose for recording the information. Normally, images will be deleted at 4 week intervals which will provide adequate time for any incidents of a criminal nature to have come to light and to have been reported to law enforcement authorities (usually the police). On occasion, however, personal information may need to be retained longer where, for example, an individual access request has been made, or an incident has been identified and time is required to enable the police to collect relevant images, or the police are investigating a crime and ask for images to be preserved to afford them the opportunity to view the information as part of an active crime investigation.

### **What organisations will be using the CCTV images and who is the data controller responsible?**

Disclosure of information from surveillance systems must be controlled and consistent with the purpose for which the system is established. The purpose of the system to be installed by the parish council is to deter and detect crime at the Village Hall and in the vicinity of the BMX track and shelter. It is intended that CCTV images produced on the system will only be used by law enforcement bodies for the purposes of investigation, for example in the event of an incident of vandalism or anti - social or other criminal behaviour. Judgements about disclosure will be made by the parish council, as data controller, with the right to refuse any request for information unless

there is an overriding legal obligation. However, once information is disclosed to the police or any other law enforcement body, they will become data controller for the copy they hold.

### **Sustainability of the scheme**

In considering potential investment in a permanent CCTV system, the parish council has undertaken to investigate systems' capabilities and their costs. Consultation and agreement with the Village Hall Management Committee and Youth Club Committee has taken place. Funding has been applied for. All this has taken several months in view of the council's responsibility to the community and to obtain value for money.

To establish costs and the most effective systems for the purpose to be addressed, the council has proceeded with a Tender Analysis with two well-regarded professional contractors who were both eager to win the contract. Scheme designs, proposed equipment and future maintenance provision have been examined, compared and debated by the council until councillors were confident of the most suitable and cost effective proposal.

The equipment allows for easy location. Cameras are sited so they produce clear images; the infra-red function enables 24hr coverage with good night-time recording definition. Image capture can be restricted to ensure that the cameras do not view areas that are not of interest and not intended to be subject of surveillance, e.g. the gardens, front doors, living room of householders, etc. A particular aspect is the remote monitoring which enables a quick response to an incident and enables checks on the system as well as making adjustments remotely. Efficient extraction of personal data in response to a subject access is easy as is redaction of privacy data where deemed necessary.

Supply/installation cost of the system chosen amounted to £5,813, with a discount of £307. Final price amounted to £5506 excluding VAT. Maintenance and app costs annually will be £158. Cost and installation of secure locked cupboard £128. Electrical mains installation £286 exclusive of VAT.

In September 2017, application was made to the Devizes Area Board for capital funding in the sum of £2,753 under the Board's project themes:

- Children & young people
- Countryside, environment & nature
- Festivals, fetes & fayres
- Inclusion, diversity & community spirit
- Safer communities
- Sport, playground & recreation

The sum applied for - matched funds (£2753) - has been awarded; secure locked cupboard (£128), electrical mains installation (£286) and maintenance and app costs (£158 per year) to be provided from precept money.

Sustainability of the scheme is assured. The CCTV system (for which funding in full upfront is available) will last for many years. The system will be maintained and monitored annually and insurance paid from precept money.

Annual checks will be carried out to ensure that the system is working properly and produces high quality images and to consider whether it is still appropriate and able to meet the specific need it is set up to deliver.

### **Letting people know surveillance is in place**

Individuals will be informed when they are about to enter or are in the area where the surveillance system is in operation. This will be done by the prominent placing of signs around and at the entrances to the Village Hall, Youth Club and at the perimeters, approaches and in the area of the BMX track and shelter. A number of signs have been allowed for within the quotation for the system and others required will be furnished by the parish council. They will be clearly visible and readable, of an appropriate size depending on the context and signal that West Lavington Parish Council is operating the system, the purpose for it and who to contact about the scheme.

The CCTV system will be registered with the ICO as is required of systems used to record and store images of members of the public.

### **What future demands may arise for wider use of images and how will these be addressed?**

It is not currently considered that the images from the surveillance camera scheme will be used, or have any possibility for use, for a purpose other than as contemplated in this privacy impact assessment. Should any such occasion arise in the future, the council will undertake a further privacy impact assessment to enable it to consider and deal with potential changes and updates, including to the council's privacy notice and policies and procedures, and provide individuals with information of the new purpose(s). If the Parish Council decides to change the way in which it uses the CCTV, it will inform the Information Commissioner within 28 days.

Sign-off

### **Chairman**

Sandra Gamble

on behalf of West Lavington Parish Council

**Adopted 1 February 2018**

## APPENDIX 1

### Examples of vandalism, anti-social behaviour and drug taking around Village Hall and BTX track between June and December 2016

- discarded needles and drug paraphernalia located on the lane at the back of the track. Police alerted by dog walker. WC tasked with disposing.
- small stones poured down drain outside VH kitchen. Plumber had to be employed to clear drains. Reported to council by VH officer.
- VH windows broken. New windows needed to replace. Reported to council.
- VH drain pipe destroyed, another broken. Village Hall officers replaced. Reported to police.
- trash on playing field – complaint received.
- graffiti painted over in VH entrance by VH committee member.
- youths on roof of VH with lighted bottles. Reported to council.
- noisy youth group behaviour around village hall at 3 am - litter cleared the next morning by Youth Club officer - resident called police.
- blackberries and redberries smashed into all the play equipment in Robert's Playground equipment (slide, pole, rotating dish, wooden beam, etc.). Reported to the Clerk by a father. Councillor cleaned.
- outer green plastic casing of rubbish bin by the BMX shelter burnt to the ground. Photograph of burnt bin and charred rubbish available. Reported by VH staff to police and that fires there are a regular occurrence. Confirmed by mother residing nearby. Replaced by PC at cost of £220.
- VH kitchen door glass smashed - probably by a stone thrown at it. Reported by VH officer to police.
- youths sleeping in the hall doorway. Reported by VH officer to council.
- blackberries plastered on VH walls (separate incident to the one above). Reported by VH officer to council.
- youths (15 in number or so) arrive regularly at night, or are dropped off by car - from out of town?, and congregate at BMX shelter, drinking (evidence suggests drug taking), stay very late and make a lot of noise. Reported by a resident and then to the police.
- missing outside security light at VH.
- beer cans and rubbish cleared from entrance to VH.
- bench from VH area taken down the field and wrecked.
- loud noise and music at night from playground. Reported to police by local resident.
- broken guttering around kitchen side of hall.
- large VH wheelie bin flung down steps upturned onto playing fields.
- youths on VH roof, three tiles torn off – discovered next morning. Police attended but too late to apprehend, took names.
- large VH wheelie bin set on fire, fire brigade called, damaged grass on playing field.



## APPENDIX 3

### WEST LAVINGTON PARISH COUNCIL

Parish Clerk's Office  
2 The Mercers  
High Street  
West Lavington  
Devizes  
Wiltshire SN10 4BE  
clerk@westlavington.org.uk

20 August 2016

Dear Resident

#### **Vandalism and Anti-social behaviour**

It is my unhappy duty to draw residents' attention to a spate of vandalism and anti-social behaviour around the Village Hall and the playing field. As a near neighbour, I expect you are already aware of these issues.

In recent times, significant damage has been done to drainpipes at the Hall. Windows have been broken.

Near the bike track, a rubbish bin has been destroyed by fire and there is evidence of drug-taking.

The Parish Council has also received reports of noise and disturbance late at night.

The Parish Council is seeking to bring this behaviour to an end and is in touch with the police. They have asked that any anti-social behaviour be reported to the police by calling 101. If an emergency response is needed, call 999.

If you want to report a crime but do not want to be identified, call Crimestoppers on 0800 555 111

Our local police team members are PC Joanne Newbery, PCSO Fiona Marno and PCSO Ellen Carter. Please feel free to contact them on 101 or via email to [devizesnpt@wiltshire.pnn.police.uk](mailto:devizesnpt@wiltshire.pnn.police.uk).

It is also helpful if you can report any incidents you see or concerns you may have to the Parish Council. You can do this by contacting the Clerk to the Council whose details appear above.

Very many thanks for your help.

Yours sincerely,

**Sandra Gamble**  
Chairman