

BINGLEY TOWN COUNCIL



Bingley Town Council, Myrtle Place, Bingley, BD16 2LF

Bingley Town Council

CCTV Privacy Impact Assessment

[Location of the surveillance camera system to be assessed](#)

Bingley Town Council Hub – Office and Public Toilets

Date of assessment: 14th February 2024
Review date: February 2025
Name of person responsible: Chair, Bingley Town Council

[Introduction](#)

Using CCTV can intrude on privacy because it is capable of putting law-abiding people under surveillance and recording their movements as they go about their day to day lawful activities.

Careful consideration must be given to whether to use it or not. The fact that it is available, affordable and has public support should not be the primary motivating factor. The Town Council should take into account what benefits can be gained, whether better solutions exist, and what effect it may have on individuals. The existence of a “Pressing need” should be established.

Bingley Town Council considers these matters objectively as part of an assessment of the scheme’s impact on people’s privacy. There are various questions that need to be answered to successfully provide a privacy impact assessment; those questions are outlined below.

[Privacy Impact Assessment](#)

The following Privacy Impact Assessment considers the Data Protection Act (DPA), the Human Rights Act (HRA) and General Data Protection Regulations (GDPR).

What organisations will be using the CCTV images? Who will take legal responsibility under the DPA?

- Bingley Town Council (BTC) will be the sole users of the CCTV system.
- BTC will be the Data Controller at the point of images being recorded. However, if these images are passed to the Police or any other statutory body then the legal responsibility will be transferred to that body as the data controller for the images that have been passed to them.

What is the organisation’s purpose for using CCTV? What are the issues that the system aims to address?

- There are, and have been, incidences of criminal or anti-social behaviour in Bingley town centre.
- On occasions the Town Clerk, Deputy Clerk and Administrative Officer(s) are effectively 'lone workers' and the use of CCTV should help to secure their well-being.

What are the benefits to be gained from using CCTV?

- CCTV is a proven tool in detecting crime and the perpetrators of crime. Using CCTV can significantly reduce the time and cost to the police in investigating incidents. It is also known that false allegations can be made and CCTV is a useful tool in disproving some allegations.
- CCTV captures actual events and is not influenced by interpretation.

Can CCTV realistically deliver these benefits?

- Yes, and consistently does.

Can less privacy intrusive solutions, such as improved lighting, achieve the same objectives?

- Not satisfactorily in this location.

Do we need images of identifiable 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 if they have been involved in crime or anti-social behaviour. Footage from the system may be used in court. 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?

- Legislation can and does change. BTC will therefore comply with all future regulations placed upon it.

What are the views of those under surveillance?

- There are some members of society both law abiding and those who are not, who have issues with being in areas covered by CCTV cameras.
- By abiding with current legislation, BTC aims to show that the CCTV system is only used for crime and anti-social behaviour reduction/detection purposes and those activities that assist or protect the public.
- Details of the system have been put on the Town Council's website with a section available for comment. These comments will be reviewed and acted upon accordingly.

What could we do to minimise intrusion for 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?

- The cameras used are capable of recording sound, but this has been disabled by the Town Council's preferred security company, so only video images are available. The system is to be established on a proper and legal basis and will comply with the DPA, HRA and GDPR. BTC will comply with all new legislation.

Is it necessary to address a pressing need, such as public safety, crime prevention or national security?

- Yes. Most town or village centres suffer instances of crime and Bingley is no different.

- An installed and conspicuously operating CCTV system in the BTC Hub will help deter or identify those involved in crime and/or committing acts considered anti-social behaviour in or on the building.

Is it proportionate to the problem that it is designed to deal with?

- Yes. CCTV is used to detect crime and complies with current legislation.

END