

REPORT TO PICKMERE PARISH COUNCIL

6th October 2020

AGENDA ITEM 8.6 – IROS PARKING SPACES - SECURITY

1. Background

- 1.1 This issue was discussed at a recent Council meeting, when it was resolved that the idea of CCTV and/or additional lighting to cover the lower parking spaces beyond the black gates be explored.
- 1.2 Discussions have been held with a contractor to explore the potential and the issues that might arise with such installation, and a single quotation has been requested and received.
- 1.3 In addition, Cheshire Police have been asked for advice on the issue of CCTV installation, but at the time of writing it has not been possible to arrange a site meeting to permit such a discussion. However, the Information Commissioner's Office produces various advice documents on the topic and a summary of key points is given below.

2. Report

- 2.1 The installation of CCTV is increasingly subject to concern in relation to privacy issues and the need to ensure that any such provision is justified by the security benefits it can provide, although it is also clear that many premises – commercial and residential - used by, and passed by, the general public have operating CCTV systems without apparent issue.
- 2.2 The Parish Council installed a simple CCTV system to cover the exterior of the pavilion several years ago, following vandalism, and after consultation with the Police. Such records have been accessed several times since then when incidents near the Pavilion were being investigated by the Police. In one instance, however, the Police wished to see coverage of the lower parking spaces but this was not possible with the current system. Reference to this CCTV system is made in the Council's GDPR policies which are available to the general public on the Council's website.
- 2.3 This existing CCTV system is not operational at present as the electricity supply at the Pavilion is turned off, since the building is unused because of Covid restrictions. This has been required by the Council's insurance company.

3. CCTV and ICO Guidance

- 3.1 The ICO's guidance is, as usual, extensive, although it also covers systems incorporating Automatic Number Plate Recognition, body-worn video, unmanned aerial systems, etc. Key points relating to the possible installation of CCTV in the location mentioned are as follows:
 - An initial question is the nature of the problem and whether a CCTV system would be a justified and effective solution. Do better solutions exist? What effect might the use have on individuals, and would this method be a proportionate response to the problem?
 - Might e.g. improved lighting reduce the problem more effectively than CCTV?

- A 'privacy impact assessment' should be carried out so as to assess the scheme's impact on people's privacy, the pressing need the system is meant to address, and whether the system will meet this need, based on reliable evidence.
- Establishing a clear basis for the processing of any personal information is essential; it is important to establish who has responsibility for control of the information that is collected, how the information is used and to whom it may be disclosed. The system needs to be secure in the sense that it cannot be accessed other than by authorised operators. Arrangements for the deletion of material need to be incorporated. How practicable is it to provide any such data to the Police in a suitable form? There may be a need to include provision for deciding whether to grant a request for the disclosure of information to, say, an insurance company acting for a private individual whose car has been damaged in the car park (although it is emphasised that judgements about disclosure are to be made by the organisation operating the surveillance system). There need to be provisions made for dealing with requests by private individuals for access to any information the system has on them. All these arrangements need to be clearly documented.
- Appropriate notifications about the system and its control have to be submitted to the ICO.
- The continuing need for the use of such a system, as well as the procedures surrounding its operation, should be regularly reviewed.

3.2 The guidance states that it can be appropriate to disclose surveillance information to a law enforcement agency when the purpose of the system is to prevent and detect crime.

3.3 In Pickmere's case it would be possible to design a system, with accompanying documentation, which satisfies the ICO's guidance. The land to be surveyed by any CCTV system here is private land owned by the Parish Council. Care could be taken to avoid coverage of adjoining private property and the system could be set to operate only during particular hours. Appropriate arrangements would be made to restrict access to the recorded information to certain individuals to be identified by the Parish Council, and in any case it is most unlikely that the system would be interrogated unless there had been some kind of incident warranting it. The system could be set up to overwrite recorded data on a regular and relatively frequent basis. There is no suggestion that the data collected would be connected to the internet.

4. Additional lighting

4.1 As a supplementary or as a standalone measure, it would be possible to install an additional lamppost in the grass verge near the lower spaces (say similar in design to the two illuminating the upper parking spaces), thereby illuminating the lower spaces. This could be fed from the Pavilion's electricity supply. It is considered that this might be less intrusive to adjoining residents than provision of a movement sensor light. Such a lamp could supplement a CCTV system or it might in itself avoid the need for such a system.

5. Potential costs

5.1 As mentioned, one quotation has been requested and received to act as a guide to members so as to enable judgement as to whether a CCTV system should be pursued, or simply additional lighting, or both or neither. It would not be appropriate to detail the figures quoted on the public agenda, because they are commercially sensitive. However, provision of an LED lamppost, similar in design to the two next to the upper parking spaces could be provided within a budget of £1900. A CCTV installation overlooking the parking spaces, mounted on a 4m pole

with anti-climb guard, wired back to the Pavilion, could be provided within a budget of £2750. Were both the lamp and the CCTV installation provided there would be some economy in that they could at least in part share the same cable trench.

- 5.2 Your Council's Financial Regulations stipulate that where the value of a contract is between £750 and £3000 the Clerk or RFO shall strive to obtain 2 quotations or estimates. If above £3000, 3 quotations are required. Accordingly, should Council be minded to adopt one or both of the measures discussed above, at least one further quotation would be required.

6. Recommendation

- 6.1 That Council notes the report and makes appropriate decisions.

J Steel
Parish Clerk