

Privacy Notice for CCTV and Surveillance Cameras

Service Area: Safety, Walking and Cycling

Directorate: Growth and City Development

PN-221

**Nottingham City Council
Information Compliance**

09/2021

The **Road Safety Team** are part of Nottingham City Council and are working to support the School Streets design measures to create a safer environment for walking and cycling as part of Department for Transport's Active Travel Fund programme. The Council plans to use Closed Circuit Television (CCTV) to will collect images of vehicle and pedestrian movements of all road users (including residents, staff, parents and pupils) in the following locations over a 48-hour period during September 2021 around six schools:

- **Stanstead Avenue and Brisbane Drive,**
- **Jenner Street** at its junctions with New Street and Oak Street and on Wesley Street ,
- **Kingsbury Drive and Beechdale Road** at:
 - Junction of Kingsbury Drive and Glencairn Drive
 - Kingsbury Drive between St Teresa's and Trinity Schools
 - Junction of Kingsbury Drive and Beechdale Road
 - Junction of Beechdale Road and Harvey Road
 - Beechdale Road near Trinity School
- **Highwood Avenue** at the junctions with Denewood Crescent and Oakmead Avenue
- **Fircroft Avenue** at the junctions with Denewood Crescent and Beechdale Road.

Data will be captured by cameras, typically mounted 8 metres above ground level and prior to analysis, the raw footage will be anonymised by converting to low resolution movement patterns only showing road user category (pedestrian, cyclist, vehicle) with counts and direction of travel. No number plate or facial recognition software will be used at any stage of the survey or data analysis and the raw camera footage will not be combined with any other datasets.

When recording images, Nottingham City Council will place a notice near the CCTV camera to inform you that images are being recorded.

CCTV and surveillance cameras record live, moving and still images in real-time. The cameras will record everything within its field of view, in the direction that it is pointed.

Nottingham City Council is the data controller for the personal data that we process about you. When we process personal data relating to you, we will only do so when it is necessary and where we have a lawful reason to do so.

When we process your personal data, we will comply with data protection legislation and enable you to exercise your rights contained within the legislation.

Lawful basis for processing

The basis under which the Council uses personal data for this purpose is that this is:

- **Necessary for the performance of a task carried out in the public interest by the Council or in the exercise of official authority vested in the Council**

When using CCTV, the Council will have regard to the following legislation:

- European Convention on Human Rights and Human Rights Act 1998,
- Regulation of Investigatory Powers Act 2000;
- Protection of Freedoms Act 2012;
- Freedom of Information Act 2000;
- UK General Data Protection Regulation and Data Protection Act 2018
- Transport Act 2000, as amended by the Local Transport Act 2008.

When the Council uses CCTV, we will have regard to and have measures in place to ensure compliance with the [Surveillance Camera Commissioner's Code of Practice](#), which includes twelve principles that need to be adhered to.

The Nottingham City Council CCTV Policy can be found here:

<https://www.nottinghamcity.gov.uk/information-for-residents/community/cctv/>

The legislation that contains the powers and functions that require us to process your personal data can be found here <http://documents.nottinghamcity.gov.uk/download/5939>

As the CCTV Camera will capture anything within its field of view, it may capture information that relates to or reveals sensitive information about you. Information captured may include the following special categories of data:

- Race or Ethnic origin;
- Religious beliefs;
- Physical or mental health;
- Sex life or sexual orientation

The Council uses information in these categories on the basis that such use is

- **Necessary for reasons of substantial public interest for statutory purposes**

All processing of this kind will be in accordance with the provisions of the UK General Data Protection Regulation and the Data Protection Act 2018.

Do you need to provide the information?

You are obliged by statute to provide some of the information that is specified here.

For how long will NCC retain the data?

The retention period for camera footage collected by the CCTV survey will be reviewed at 3 months after the survey date. Data will be kept for no longer than 6 months after the survey date, after which it will be destroyed. The final project report will not contain any personal data or images captured by the CCTV survey. Data will only be reported in the form of vehicle and pedestrian counts and movement heat maps.

The Council publishes an Information Asset Register (IAR), which outlines the retention periods for the personal data we process. You can find the IAR on our website [Information Asset Register](#).

Will NCC share my information with other organisations?

The Council will only share your personal information within the Council, with other organisations when it is necessary to provide services to you and when we have a lawful reason to do so. The Council may also share your information when we are obliged to so by law.

In relation to the CCTV survey, the Council will share information with:

- **Streets Systems**, the supplier contracted by the Council to carry out the CCTV camera survey including collection, processing and analysis of the data.
- **Sustrans**, a national transport charity contracted by the Council to support our School Streets project working with schools and communities in the survey areas.

Can the information be used for any other purpose?

The information provided by you may also be used for the purpose of any other function carried out by the Council. Information about these functions and the legal basis on which information is used for them can be found at <http://www.nottinghamcity.gov.uk/privacy-statement/>

The information will only be used for another purpose where it is lawful to do so.

The UK General Data Protection Regulation provides for the following rights as prescribed by the legislation:

- A right to request a copy of your information

- A right to request rectification of inaccurate personal data
- A right to request the erasure of your data known as ‘the right to be forgotten.’
- A right to in certain circumstances to request the restriction of processing
- A right in certain circumstances to request portability of your data to another provider
- A right to object to the processing of data in certain circumstances
- A right regarding automated decision making including profiling

Data Protection Officer

You can contact the Data Protection Officer at:

Loxley House,
Station Street,
Nottingham,
NG2 3NG

Or, at data.protectionofficer@nottinghamcity.gov.uk.

Information Commissioner’s Office

The Information Commissioner’s Office (ICO) website guides data protection and privacy matters; you can visit the website at www.ico.org.uk. You also have the right to complain to the ICO if you consider that the Council have processed your personal data incorrectly or that we have breached our obligations to you. You can contact the ICO at:

Wycliffe House,
Water Lane
Wilmslow,
Cheshire,
SK95AF

www.ico.org.uk

Further Information

For more information about these rights, please refer to our detailed privacy statement at <https://www.nottinghamcity.gov.uk/privacy-statement>.