

## PRIVACY IMPACT ASSESSMENT (“PIA”)

Please refer to the Council’s PIA Guidance before completing this form. The Guidance can be found in the Data Protection section of the Hytranet and Council website.

### Purpose

#### What personal information do you intend to collect or use and why ?

e.g what is the aim of the project or the reason for the data processing ?

e.g what sort of personal information will it be (such as names, addresses, CCTV footage, criminal convictions, information about age, religion or ethnicity) ?

The primary use of Automatic Number-Plate Recognition, (ANPR) is to assist the Council in managing unauthorised entry/parking in the Market Hall Service Yard, Broadway and on the new Town Square through the Council’s Parking Enforcement Agent.

ANPR is a technology that uses optical character recognition on images to read vehicle registration plates which is then checked against a known list of approved vehicles. The system can calculate the time spent on site or help operators identify vehicles which may not have been pre-approved but can be allowed entry without a penalty.

Data captured will comprise images of vehicles, registration plate and potentially the occupants of the vehicle

The data is used to detect contraventions and for reporting of the car park turnover and average duration of stay - Detected contraventions will be sent to the Driver and Vehicle Licensing Agency (DVLA) to get the registered keeper details In order for the agent to generate and issue a Notice to Keeper document.

The use of ANPR will only be used for Council owned land and the images would be monitored 24/7 by the third party parking enforcement agent, engaged under an agreement with the Council.

### Processing

#### What do you propose to do with the personal information ?

e.g how will you collect the information, where will you keep it, how will you use it, who might you share it with, how and when will you delete it ?

The use of ANPR cameras allows for the management of the areas 24/7 by the Council’s appointed parking enforcement agent. The information will be used to identify unauthorised vehicles that enter/park in an area or overstay the permitted time which will result in the issuing of a parking penalty charge.

Personal data may be shared for the payment of a parking tariff or charge with: third parties, such as a payment facilitator, an external software provider, debt recovery companies, solicitors and high court officers/bailiffs where necessary to ensure compliance with the motorist obligations under the contract. We will not transfer personal data out of the European Union.

PCN data will be held for sufficient time to enable the fee to be settled, by a motorist or another person and resolve any dispute. ANPR data where no contraventions have been detected has to be retained for 24 months, (this is a legal requirement by the DVLA for audit purposes). However, in some circumstances data may be held for longer, for example;

- When there is an ongoing dispute which requires us to hold the data for longer than normal.

- Where a court order has been made allowing us to pursue outstanding money.

## Justification

### Why is what you propose a necessary and proportionate thing to do ?

e.g is the impact on privacy proportionate to the aims of the project ?

There has been a noticeable increase in unauthorised access/parking late at night/early morning. The cameras will only monitor vehicles entering and leaving the Market Hall Services Yard, Broadway and outside the front of the Market Hall.

There will be little impact on privacy as the cameras are monitoring vehicular movements on a goods service yard/high street and the image is restricted to a vehicle's rear bodywork.

It is not financially viable for the Council to pay parking enforcement officers to patrol 24/7 and there are also Health and Safety concerns if the Council were to ask officers to patrol areas on their own late at night. The use of bollards to restrict vehicles is not possible as access to the Market Hall Service Yard is required 24/7 and the cost of fully automatic bollards is not financially viable, given the number of permits that would need to be issued/managed.

## Consultation

### Have you consulted the people who may be affected by what you propose ?

Please give details of the consultation – who did you consult, how did you consult them, what did they say and has this led you to change your proposal in any way ?

If you do not intend to consult, please explain why.

Parking enforcement is already undertaken by the Council's and County Council's nominated agents through officers patrolling the areas on foot. However, there are clear examples/complaints of unauthorised parking taking place outside the enforcement officer's normal working patterns.

There is no plan to consult with the general public about the use of ANPR cameras for these areas as they are not public car parks, already have restrictions in place and are already being patrolled by enforcement officers.

There will be clear signage displayed highlighting that parking enforcement is in place and recoding is taking place and who/how to make contact if they wish to raise concerns. Market Hall tenants and business owners affected by the cameras will be advised and provided with unloading/loading permits and their vehicle registered as having permits within the system.

## Privacy Risks

### What are the privacy risks ?

These are limited to collecting images of vehicles and vehicle registrations without the owner's knowledge / approval and a limited risk of capturing images of people.

### How will you reduce the risks ?

risk	mitigation measure(s) <i>(use a continuation sheet if you need to)</i>	risk reduced or eliminated ?
Undue Intrusion	ANPR cameras are designed to only record vehicle registrations that enter a specific area and contravene agreed system rules.	Reduced
Excessive Data Storage	PCN data will be held for sufficient time to enable the fee to be settled, by a motorist or another person and resolve any	Reduced

	dispute. ANPR data where no contraventions will only be retained for 24 months. However, in some circumstances data may be held for longer.	
Unauthorised Access	The data is stored on secure servers within the UK which only members of staff with the correct roles/security privileges can access it. Data will be transmitted and received by secure File Transfer Protocol (FTP), which utilises industry standard end to end encryption.	Reduced
Theft of Images/Data	<p>The information (Number plate data &amp; Overview - reg image) is captured via the ANPR camera which then sends the information to the enforcement system 'Zatpark' the parking agents 3rd party software supplier - Data is submitted via a secure Application Programming Interface (API) which is also protected by a Virtual Private Network (VPN).</p> <p>Data is stored on high grade servers hosted in a profession data centre in the UK, this employs the highest level of physical security Closed Circuit Television (CCTV) surveillance, manned guarding and tightly restricted access. A third party security company is employed to perform daily security and penetrating testing for all known and emerging security vulnerabilities. A daily certificate from the third party is presented at login so users are aware the system has been tested.</p>	Reduced
Sharing data with others	No data will be released without the permission of the Parking Enforcement Agent's Manager and information is only shared with the registered keeper of the vehicle, unless written authorisation has been provided by them granting permission to deal with a third party.	Reduced

**You are required to consult the DPO**

Comments of Data Protection Officer	
No comments – PIA agreed	
Signed: <i>Jane Ellis</i>	Date: 31/1/2019

Privacy Impact Assessment re .....

Continuation sheet: