

# Equality Impact Assessment

Title:	CCTV Policy	
Version:	1	
Date of draft:		<b>20.04.18</b>
Date approved by Equalities Group		<b>14.6.18</b>

## Section 1A: Overview

<b>Name of Policy, Procedure, Practice, Strategy or Service:</b>	CCTV Policy
<b>Service, Group, Team:</b>	Lead team: Community Safety
<b>Equality Assessment Lead Officer:</b>	Katherine Thornhill
<b>Head of Service</b>	Lorraine Poyser, Director of Community Services

<b>1B: Please state the intended outcomes of the policy</b>	<b>How will you know these have been achieved? <i>What performance monitoring is in place?</i></b>
<p>The aims of the CCTV Policy are;</p> <ul style="list-style-type: none"> <li>- To enhance a sense of safety by those people who live, work, trade in and visit Erewash;</li> <li>- To prevent, deter and help in detecting crime;</li> <li>- To reduce anti-social behaviour, including nuisance and vandalism;</li> <li>- To enhance the feeling of community safety;</li> <li>- To provide evidence for court, tribunal or civil proceedings;</li> <li>- To assist with the overall management of the public spaces;</li> <li>- To support effective management of Town Centre Traffic Regulation Orders;</li> <li>- To assist the Local Authority in its enforcement and regulatory functions within the Erewash area; and</li> <li>- To assist in civil emergencies.</li> </ul> <p>Erewash Borough Council, along with its partners, will meet these aims through four objectives:</p> <ol style="list-style-type: none"> <li>1. Annually reviewing the CCTV systems to ensure it continues to meets the requirements of the community, the Council and partner agencies.</li> <li>2. Ensuring that CCTV is being used to its full advantage and in a cost effectively way.</li> <li>3. Investigating new and developing technology solutions to ensure our systems remain fit for purpose.</li> <li>4. Continuing to work in partnership with organisations, retailers, licensees and businesses to improve the feelings of safety and reduce opportunities to commit crime across the Borough.</li> </ol>	<p>The following performance measures will be monitored, and others developed during this first year in operation. Current measures will include:</p> <ul style="list-style-type: none"> <li>- Number of logged incidents</li> <li>- Number of completed downloads</li> <li>- Number of Subject Access Requests received</li> <li>- Number of Subject Access Requests accepted</li> <li>- Number of Requests for Footage received from third parties</li> <li>- Number of Requests for Footage approved</li> </ul> <p>In addition, community safety indicators looking at the fear of crime, disorder and anti-social behaviour will be used as proxy</p>

	measures in recognising that CCTV has an impact on people's feelings of safety.
--	---

**Section 2A: The policy. How will the policy/plan/strategy impact on residents, visitors, businesses or other agencies that we work with?** *What work has been undertaken to advise these groups about the changes planned in the policy/plan/strategy?*

Primarily, the policy will have a direct impact upon Derbyshire Constabulary as a trusted partner in the use of CCTV, who are being consulted as part of the development of these documents. They also impact on the use of CCTV in the workplace, in and on council owned buildings and also Body Worn Video (BWV) such as that used by Neighbourhood Wardens.

In relation to residents, businesses and visitors there will be very little change to these groups as all of the systems noted in the documentation are already in place and being utilised appropriately. This documentation change condenses and revises the existing documents in line with recent legislative changes.

However, it is noted that CCTV is something that we need to ensure residents, businesses and visitors to the borough are aware of, as well as our own staff and Councillors. We are therefore undertaking a review of all the signage around the borough and on our premises to ensure it is appropriate and compliant, a review of the CCTV pages on both the internet and intranet, an audit of the camera locations and when the documentation is approved, appropriate media releases regarding the information.

**2B: What needs is the policy/service designed to meet?** *You could also refer to your current Service Plans and how the policy/service fits into EBC's Corporate Plan Priorities. How does the policy, procedure, practice, strategy or service align with Corporate Priorities*

The system purpose / data processing reasons are:

- To prevent and detect crime, disorder and anti-social behaviour;
- For the safety of the public and staff at these locations;
- For EBC service delivery.

The use of CCTV across the borough complements all of the Corporate Plan 2016-2019 objectives:

- A clean, safe and welcoming borough
- Improved access to services
- Delivering efficient and effective services that residents need
- Creating opportunities for economic growth and prosperity
- A well run efficient council

It also links into the Local Strategic Partnership and Community Safety Partnership priorities of:

LSP:

- Economic wellbeing
- Employment and skills
- Health and wellbeing
- Safer Communities

CSP:

- Reduce ASB
- Reduce crime
- Support vulnerable people
- Build empowered and resilient communities

**2C: Is the service provided subject to any element of outsourcing? Is the service delivered in part, or in its entirety by an outside company or organisation? If challenged about a service delivered on our behalf you must show that the organisation meets the expectations with regard to equalities in its customer service and recruitment and retention of staff.**

The service is not subject to outsourcing but the installation / maintenance of both the hardware and software is done via external supplier/contractor. The contract for on-street (i.e. external CCTV) is managed by the Neighbourhood Warden Manager and the Procurement Team, therefore complying with the requirements. In-house and premises CCTV will be managed by a relevant HOS (to be determined).

## **Section 3A: Gathering Information**

**What equality monitoring information do you gather and how is this information used to develop services, functions and policies at the current time. You could look at the take up of services, customer satisfaction (complaints and compliments) and enforcement action.**

The information to be gathered (as noted in Section 1B) will allow us to look at where the requests for footage or SARs are coming from. The CCC system will also allow the council to monitor the information received from the public about things we are doing well or not so well in relation to CCTV. We will therefore be able to monitor if there are any gaps. The systems will also be used to support the safety of our own staff and to protect from and deter crime at all council owned premises. The data/images captured may also be used for other employees matters as identified in the Privacy Notice(s).

**3B: What does available data and the results of any consultations show about the take up of services? What is the impact on different groups? (qualitative and quantitative).** *You could look at previous community consultation exercises, customer reviews, census data, staff feedback etc. Does your consultation identify responses by protected characteristic or identify particular community and voluntary groups that you worked with.*

**Remember:** by law you are required to be able to demonstrate, through data analysis and evidence, that you have considered the impact of your service on **ALL** of the relevant protected groups. This document is just a short summary of this process and a tool to help you to check that you have taken the Equality Act 2010 and the Council's equality objectives into consideration.

The service is not one that has a 'take-up' of service. We know from consultation that residents appreciate knowing that CCTV is in our public spaces, and nationally it is still recognised as contributing to reducing the fear of crime, disorder and anti-social behaviour, thereby increasing quality of life. We also know that on the other hand CCTV is a topic that people are passionate about, and that they don't like feeling that they are being 'monitored' unnecessarily. This means that we need to ensure that the public and our staff have confidence in us and our practices so that they feel we will use data/images within the legitimate purposes and are open and honest about why, when and how it is used.

**Section 4: Impact Assessment** *Here you need to analyse the needs of different groups and the possible impacts the service may have on them. How is the policy or decision likely to affect the **promotion of equality** and the **elimination of discrimination** in each of the groups?*

Stake Holder Group	Is this group likely to be affected in a positive way?	In what way will they be affected?	Is this group likely to be affected in a negative way?	In what way will they be affected?
Age (older people, young	<b>Yes</b>	Group will feel reassured that the	<b>Yes</b>	They may feel nervous about having their

people)		public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.		image captured.
People with Disabilities (Both physical and mental impairments)	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.	<b>Yes</b>	They may feel nervous about having their image captured.
Gender (Women, Men, Transgender, Transsexuals)	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.	<b>Yes</b>	They may feel nervous about having their image captured.
Race (Black, Asian, Minority Ethnic groups. Include people whose first language is not English)	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.	<b>Yes</b>	They may feel nervous about having their image captured.
Sexual Orientation	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.	<b>Yes</b>	They may feel nervous about having their image captured.
Religion and belief	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality	<b>Yes</b>	They may feel nervous about having their image captured.

		of life.		
Dignity, Human Rights and Socio-economic disadvantage	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.	<b>No</b>	
Marriage and Civil partnerships	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.	<b>No</b>	
Pregnancy and maternity/paternity	<b>Yes</b>	Group will feel reassured that the public areas they use across the borough are covered by CCTV should anything happen, reducing fear of crime and therefore improving quality of life.	<b>No</b>	

<b>Section 5A: Actions How will you monitor the ongoing effect of the policy/strategy/plan?</b>	<b>When will this be undertaken?</b>	<b>Expected outcomes / performance measures</b>	<b>Which Corporate Plan aim will this action meet?</b>
<p>Undertake a review of all the signage around the borough and on council premises to ensure it is appropriate, clear and compliant.</p> <p>A review of the CCTV pages on both the internet and internet to ensure the documentation is all available and up-to-date.</p> <p>An audit of the camera locations as a starting point for</p>	All will be undertaken during 2018-19	<p>Increased feelings of safety across the borough.</p> <p>Increased confidence in the council regarding its open communication about CCTV.</p> <p>Increased usage of the</p>	All aims.

<p>annual reviews.</p> <p>Appropriate media releases regarding the new documentation and how people can find more information.</p> <p>Privacy assessments and review of Privacy Impact Zones.</p> <p>Analysis of requests to view data/images held to assess access to protected groups i.e. ensuring that no particular group is over 'viewed'.</p>		<p>systems.</p> <p>Raised awareness of and use of procedures and processes relevant to the Policy.</p>	
--	--	--	--

<b>5B: If you have identified any negative impacts on any of the groups in section 4 how will you mitigate the effect?</b>					
<b>Negative impact</b>	<b>Action required to mitigate any potential negative impact</b>	<b>Outcome / performance measure</b>	<b>Lead Officer – who will the monitoring of this action be reported to?</b>	<b>Date that the monitoring will be undertaken, how often will it be done?</b>	<b>Which of the current Equality Objectives does this action meet? (State number *)</b>
Groups who may feel that CCTV camera image capture is being targeted at them	Ensure that the training of volunteers ensures the appropriate use of cameras and data capture	Ongoing and up to date training for volunteers	Community Safety Officer/Partnership	As part of the management of CCTV volunteers	Objective 1, Objective 2

\*The objectives are:

1. **Provide a welcoming and safe place for our communities, visitors and businesses which embraces equality and is free from discrimination.**



2. **Provide relevant services that are free from discrimination and delivered in a way that is responsive and accessible.**
3. **Understand and value the diversity of our communities through community engagement**
4. **Foster an accessible and inclusive working environment for all our staff and strive to achieve a workforce that is representative and diverse.**