DATA PROTECTION IMPACT ASSESSMENT

CARRYING OUT A DATA PROTECTION IMPACT ASSESSMENT ON SURVEILLANCE CAMERA SYSTEMS

Town Centre & Primary (multi-area) Public Space CCTV System

Purpose of this advice and template

Principle 2 of the surveillance camera code of practice[1] states that the use of a surveillance camera system must take into account the effect on individuals and their privacy, with regular reviews to ensure its use remains justified. The best way to ensure this is by carrying out a data protection impact assessment (DPIA) before any surveillance camera system is installed, whenever a new technology or functionality is being added on to an existing system, or whenever there are plans to process more sensitive data or capture images from a different location. This will assist in assessing and mitigating any privacy issues linked to the use of a surveillance system.

A DPIA is one of the ways that a data controller can check and demonstrate that their processing of personal data is compliant with the General Data Protection Regulation (GDPR)[2] and the Data Protection Act (DPA) 2018. There are statutory requirements to carry out a DPIA in Section 64 DPA 2018 and article 35 of the GDPR.

The Information Commissioner has responsibility for regulating and enforcing data protection law, and has published detailed general guidance on how to approach your data protection impact assessment. In many cases under data protection law, a DPIA is a mandatory requirement. The Surveillance Camera Commissioner (SCC) and the Information Commissioner's Office (ICO) has worked together on this advice, which is tailored to the processing of personal data by surveillance camera systems.

Suggested steps involved in carrying out a DPIA are shown in **Appendix One.**

A further benefit of carrying out a DPIA using this template is that it will help to address statutory requirements under the Human Rights Act 1998 (HRA). Section 6(1) HRA provides that it is unlawful for a public authority to act in a way which is contrary to the rights guaranteed by the European Convention on Human Rights (ECHR). Therefore, in addition to the above, as a public body or any other body that performs public functions you must make sure that your system complies with HRA requirements. Whilst the particular human rights concerns associated with surveillance tend to be those arising from Article 8 which sets out a right to respect for privacy, surveillance does also have the potential to interfere with rights granted under other Articles of the ECHR such as conscience and religion (Article 9), expression (Article 10) or association (Article 11).

If you identify a high risk to privacy that you cannot mitigate adequately, data protection law requires that you must consult the ICO before starting to process personal data. Use of any surveillance camera system with biometric capabilities, such as Automated Facial Recognition technology, is always likely to result in a high risk to the rights and freedoms of individuals and therefore a DPIA must always be carried out in respect of those systems before you process any personal data. There is a risk matrix at **Appendix Two** that can help you to identify these risks.

Who is this template for?

To complement the ICO's detailed general guidance for DPIAs, the SCC has worked with the ICO to prepare this template specifically for those organisations in England and Wales that must have regard to the Surveillance Camera Code of Practice under Section 33(5) of the Protection of Freedoms Act 2012. This template helps such organisations to address their data protection and human rights obligations in the specific context of operating surveillance cameras.

This surveillance camera specific DPIA is also intended to be of value to the wider community of public authorities and any other bodies, whether public or private, who perform public functions. This secondary

[1] Surveillance Camera Code of Practice issued by the Home Secretary in June 2013 under Section 30(1)(a) Protection of Freedoms Act 2012

[2] Regulation (EU) 2016/679 of the European Parliament and European Council, also known as the General Data Protection Regulation, was transposed into UK law through the Data Protection Act 2018. Any processing of personal data by competent authorities for the prevention, investigation, detection or prosecution of criminal offences is regulated under Part 3 of the Data Protection Act 2018 which transposes Directive (EU) 2016/680, also known as the Law Enforcement Directive, into UK law.

audience is subject to the same legal obligations under data protection and human rights legislation, and is encouraged by the SCC to follow guidance in the Surveillance Camera Code of Practice on a voluntary basis.

When should you carry out the DPIA process for a surveillance camera system?

- Before any system is installed.
- Whenever a new technology or functionality is being added on to an existing system.
- Whenever there are plans to process more sensitive data or capture images from a different location.

In deciding whether to carry out a DPIA and its scope, consideration must be given to the nature and scope of the surveillance camera activities and their potential to interfere with the privacy rights of individuals.

You **must** carry out a DPIA for any processing of surveillance camera data that is likely to result in a high risk to individual privacy. The GDPR states that a DPIA "shall in particular be required in the case of ……. systematic monitoring of publicly accessible places on a large scale" (Article 35).

Furthermore, as a controller in relation to the processing of personal data, you must seek the advice of a designated Data Protection Officer when carrying out a DPIA.

To assess the level of risk, you must consider both the likelihood and the severity of any impact on individuals. High risk could result from either a high probability of some harm, or a lower possibility of serious harm. It is important to embed DPIAs into your organisational processes such as project planning and other management and review activities, and ensure the outcome can influence your plans. A DPIA is not a one-off exercise and you should see it as an ongoing process, and regularly review it.

As part of an ongoing process, your DPIA should be updated whenever you review your surveillance camera systems, it is good practice to do so at least annually, and whenever you are considering introducing new technology or functionality connected to them.

The situations when a DPIA should be carried out, include the following:

- When you are introducing a new surveillance camera system.
- If you are considering introducing new or additional technology that may affect privacy (e.g. automatic facial recognition, automatic number plate recognition (ANPR), audio recording, body worn cameras, unmanned aerial vehicles (drones), megapixel or multi sensor very high resolution cameras).
- When you are changing the location or field of view of a camera or other such change that may raise privacy concerns.
- When you are reviewing your system to ensure that it is still justified. Both the Surveillance Camera Code of Practice and the ICO recommend that you review your system annually.
- If your system involves any form of cross referencing to other collections of personal information.
- If your system involves more than one company or agency undertaking activities either on your behalf or in their own right.
- When you change the way in which the recorded images and information is handled, used or disclosed.
- When you increase the area captured by your surveillance camera system.
- When you change or add an end user or recipient for the recorded information or information derived from it.

If you decide that a DPIA is not necessary for your surveillance camera system, then you must record your decision together with the supporting rationale for your decision.

Description of proposed surveillance camera system

Provide an overview of the proposed surveillance camera system

This should include the following information:

- An outline of the problem(s) the surveillance camera system is trying to resolve.
- Why a surveillance camera system is considered to be part of the most effective solution.
- How the surveillance camera system will be used to address the problem (identified above).
- How success will be measured (i.e. evaluation: reduction in crime, reduction of fear, increased detection etc).

In addition, consideration must be given to the lawful basis for surveillance, the necessity of mitigating the problem, the proportionality of any solution, and the governance and accountability arrangements for any surveillance camera system and the data it processes.

The following questions must be considered as part of a DPIA:

- Do you have a lawful basis for any surveillance activity?
- Is the surveillance activity necessary to address a pressing need, for example: public safety; the prevention, investigation, detection or prosecution of criminal offences; or, national security?
- Is surveillance proportionate to the problem that it is designed to mitigate?

If the answer to any of these questions is no, then the use of surveillance cameras is not appropriate.

Otherwise please proceed to complete the template below, where your initial answers to these questions can also be recorded.

DATA PROTECTION IMPACT ASSESSMENT TEMPLATE

Statutory requirements in Section 64 DPA 2018 and article 35 of the GDPR are that your DPIA **must**:

- describe the nature, scope, context and purposes of the processing;
- assess necessity, proportionality and compliance measures;
- identify and assess risks to individuals; and
- identify any additional measures to mitigate those risks.

Statutory requirements in Sections 69-71 DPA 2018 and articles 37-39 of the GDPR are that if you are a public authority, or if you carry out certain types of processing activities, you **must** designate a Data Protection Officer (DPO) and always seek their advice when carrying out a DPIA. The ICO provides guidance on the requirement to appoint a DPO. If you decide that you don't need to appoint a DPO you should record your decision and your supporting rationale. In the performance of their role, a DPO must report to the highest management level within the controller.

These statutory requirements indicate that a DPIA should be reviewed and signed off at the highest level of governance within an organisation.

To help you follow these requirements this template comprises two parts.

Level One considers the general details of the surveillance camera system and supporting business processes, including any use of integrated surveillance technologies such as automatic facial recognition. It is supported by **Appendix Three** which helps to capture detail when describing the information flows. The SCC's Passport to Compliance provides detailed guidance on identifying your lawful basis for surveillance, approach to consultation, transparency and so on.

Level Two considers the specific implications for the installation and use of each camera and the functionality of the system.

Town Centre & Primary (multi-area) Public Space CCTV System

Template – Level One

Location of surveillance camera system being assessed:

Town Centre & Primary (multi-area) Public Space CCTV System

Date of assessment	July 2019
Review date	Septemeber 2020
Name of person responsible	Peter A Webster
Name of Data Protection Officer	Neil Wilcox

GDPR and Data Protection Act 2018 and Surveillance Camera Code of Practice

1. What are the problems that you need to address in defining your purpose for using the surveillance camera system? Evidence should be provided which includes relevant available information, such as crime statistics for the previous 12 months, the type, location, times and numbers of crime offences, housing issues relevant at the time, community issues relevant at the time and any environment issues relevant at the time.

The role of the Town Centre & Primary (multi-area) Public Space CCTV System is:

- To support and assist in the prevention & detection of crime and anti-social behaviour by providing video evidence in support of prosecutions.
- To deter crime, to improve staff & public safety and enhance the general perception of safety in this area.
- To assist in the prevention and reduction of crime, public disorder and anti-social behaviour in public places.
- To assist the tracking and apprehension of people who are suspected of either having committed a criminal offence or attempted to do so.
- To assist in the identification of victims & any witnesses of criminal behaviour.
- To promote the objectives of the Safer Slough Crime & Disorder Reduction Partnership.

To support and assist in the management and safety of public events in Salt Hill Park and route into and out of this area. To assist the council in its enforcement and any regulatory functions.

General crime types & related community issues including crime types such as:

1. Serious violent & sexual crime
2. Theft, shoplifting & ASB
3. Vehicle crime (ToMV 7 TFMV)
4. Drug related crime

2. Can surveillance camera technology realistically mitigate the risks attached to those problems? State why the use of surveillance cameras can mitigate the risks in practice, including evidence to justify why that would be likely to be the case.

The capture of video evidence of criminal bahviour in public recreational spaces is a well established and evidentially effective one. CCTV within the public parks which is used proportionately and lawfully is a tool which is used to gather primary and supportive evidence for agencies who have a statutory duty to investigate and prosecute crime and disorder. CCTV camera systems can be used effectively to detect and deter crime and ASB. It is also used to assist with public events for public safety.

3. What other less privacy-intrusive solutions such as improved lighting have been considered? There is a need to consider other options prior to any decision to use surveillance camera systems. For example, could better lighting or improved physical security measures adequately mitigate the risk? Does the camera operation need to be 24/7? Where these types of restrictions have been considered, provide your reasons for not relying on them and opting to use surveillance cameras as specified.

A range of alternative solutions are always considered including the use of additional council staff resources such as Neighbourhood Enforcement teams, Community Safety Officers & housing officers together with investigating improvements to street lighting, alleyway gating projects. The use of manned guarding and mobile Enforcement Wardens are all considered prior to the use of active CCTV surveillance systems.

4. What is the lawful basis for using the surveillance camera system? State which lawful basis for processing set out in Article 6 of the GDPR or under Part 3 of DPA 2018 applies when you process the personal data that will be captured through your surveillance camera system.

GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the data controller.

5. Can you describe the information flows? State how data will be captured, whether it will include audio data, the form of transmission, if there is live monitoring or whether data will be recorded, whether any integrated surveillance technologies such as automatic facial recognition is used, if there is auto deletion after the retention period, written procedures for retention in line with stated purpose, written procedures for sharing data with an approved third party, record keeping requirements, cyber security arrangements and what induction and ongoing training is provided to operating staff. Specific template questions to assist in this description are included in **Appendix Three**.

CCTV Image Data (audio is never captured) is transmitted electronically by various secure means from the CCTV camera to a secure CCTV Centre which is manned 24x7. This image data is recorded and stored in video format within a secure server room with highly restricted access by trained and authorised staff only. Received video images are delivered from the recording devices (cameras) to the staff monitoring them within the secure CCTV Centre. The retention period of captured video data is 31 days after which time the data is automatically deleted from the system without the need for manual intervention unless the data is requested by an authorised person in pursuance of a criminal or civil investigation. If this is the case, the data will be copied form the system and an evidence pack created.

Detailed procedures and policies exist within the Council to ensure that the recorded data is handled, used and deleted in the most appropriate and lawful manner. All CCTV staff have received relevant training in legislation, procedures and the effective use of the system. These staff are qualified to BTeC standards, and refreshers are regularly undertaken. Staff are Enhanced DBS (Adults and Children) cleared and vetted. An external contractor is commissioned to secure and protect our IT systems from unauthorised intrusion.

6. What are the views of those who will be under surveillance? Please outline the main comments from the public resulting from your consultation – as part of a DPIA, the data controller should seek the views of those subjects who are likely to come under surveillance or their representatives on the proposition, without prejudice to the protection of commercial or public interests or the security of processing operations. This can often be achieved by existing local consultation mechanisms such as local area committees or safer neighbourhood team meetings; but, if necessary depending on the privacy intrusion of the surveillance in question, other methods could be considered such as face to face interviews, online surveys, questionnaires being sent to residents/businesses and addressing focus groups, crime & disorder partnerships and community forums. The Data Protection Officer may be able to offer advice on how to carry out consultation.

The views and support of the public are an important factor when using CCTV. Our community are very supportve and frequently ask their Ward Councillor for addional CCTV camera systems be installed into their community. Our Community Safety Officers are out amongst the community frequently and support residents' requests for a more secure environment. We carry out frequent ASB surveys and this survey contains the question "Do you think that CCTV helps to build safer communities"? 88% of 350 respondants replied yes to this question when asked.

7. What are the benefits to be gained from using surveillance cameras? Give specific reasons why this is necessary compared to other alternatives. Consider if there is a specific need to prevent/detect crime in the area. Consider if there would be a need to reduce the fear of crime in the area and be prepared to evaluate.

Due to the main town centre system being originally installed in the mid-1990's it is not known what public consultation, if any, took place at the time however generally speaking, the public have always supported our use of CCTV to make the town safer. Therefore, our CCTV systems are being assessed on the basis of current public expectations requests for additional camera to be installed. All future requests for CCTV will undergo a DPIA and public consultation.

8. What are the privacy risks arising from this surveillance camera system? State the main privacy risks relating to this particular system. For example, who is being recorded; will it only be subjects of interests? How long will recordings be retained? Will they be shared? What are the expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective? What is your assessment of both the likelihood and the severity of any impact on individuals?

The borough of Slough is home to a racially mixed community and has a very well-established tolerant community identity. The town is located just west of the London (M25) area where we face all the challenges of a large metropolitan city condensed into a small unitary authority area. The use of parks and open spaces is highly encouraged as is the use of the newly installed outdoor gyms where residents are encouraged to keep fit and active. The Council promotes fitness and wellbeing through the wider use of our parks and also organises events which are very well attended

CCTV video evidence is used effectively for criminal and civil investigations whilst at all times observing the respect for the right to privacy. All of our systems are installed, maintained and operated professionally providing high quality primary and secondary video evidence for investigators to use.

We share the evidential product only with those who have a legitimate need for it and only once they have demonstrated that they are able to handle the data appropriately.

In the last 15 years operating CCTV, we have had less than 4 Subject Access Requests and this, in my view, reflects the public's confidence that we are operating our CCTV systems to a very high standard and that we take their privacy very seriously indeed.

9. Have any data protection by design and default features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements? State the privacy enhancing techniques and other features that have been identified, considered and accepted or rejected. For example, has consideration been given to the use of technical measures to limit the acquisition of images, such as privacy masking on cameras that overlook residential properties? If these have not been adopted, provide a reason.

We do not employ the use of Privacy Zones on the cameras that have this feature available as the risk of a privacy zone blocking an offence taking place is significant furthermore, very few of our cameras are located outside of public places where the expectation of privacy is lower. Instead, we have developed a policy, staff sign-off and staff training regime that places the responibility of respect for privacy upon camera Operators. The cameras are only operated by professionally trained, skilled and qualified (in-house) CCTV Operators. The cameras are focussed on public circulation and "hotspot" and traffic intense areas only. Frequent audits of all CCTV Operators' activity are undertaken to ensure compliance with our policy on this and staff also monitor each other's recorded camera activity.

10. What organisations will be using the surveillance camera images, and where is the controller responsibility under the GDPR and Data Protection Act 2018? List the organisation(s) that will use the data derived from the camera system and identify their responsibilities, giving the name of the data controller(s) and any data processors. Specify any data sharing agreements you have with these organisations.

Slough Borough Council has a dedicated Data Protection Officer and a Director nominated & responsible for the role of Senior Responsible Officer. The SCC has been made aware of these individuals.

Other data processors include:

- The signatories to the Thames Valley Data Sharing Agreement (Fire, police, ambulance, public health, housing, education etc.)
- Those authorised to carry out investigations (Trading Standards, Environmental Health. Corporate Fraud) etc.
- Statutory authorities responsible for prosecutions
- Data subjects

11. Do the images need to be able to recognise or identify individuals, or could the purpose be met using images in which individuals cannot be identified? Explain why images that can recognise or identify people are necessary in practice. For example, cameras deployed for the purpose of ensuring traffic flows freely in a town centre may not need to be capable of capturing images of identifiable individuals, whereas cameras justified on the basis of dealing with problems reflected in assessments showing the current crime hotspots may need to capture images in which individuals can be identified.

For the purposes of the detection of crime or any ASB, all recorded images should be capable of identifying individuals who may be suspects, or victims or witnesses of a criminal offence.

Identifying factors required for evidential purposes would include location, stature, IC code, clothing and/or distinctive features or items being carried together with any vehicle make, model, type, colour together with any visible vehicle registration number.

For public safety and traffic monitoring purposes of CCTV, the majority of recorded images would not be of sufficient quality as to be admissible in relation to personal data unless the CCTV camera was being used by an Operator to monitor an incident in real time or prior to or immediately after a specific event, such as an Road Traffic Collision (RTC)

12. How will you inform people that they are under surveillance and respond to any Subject Access Requests, the exercise of any other rights of data subjects, complaints or requests for information? State what privacy notices will be made available and your approach to making more detailed information available about your surveillance camera system and the images it processes. In addition, you must have procedures in place to respond to requests for camera footage in which a subject appears, and to respond to any other request to meet data protection rights and obligations.

Slough Borough Council (SBC) uses their own specific and ICO approved CCTV signage which is displayed at Borough boundaries and at each CCTV camera site.

Access Requests and any CCTV related complaints are detailed on the Council's website and are available from the CCTV Centre manager or from the SBC Corporate Complaints team.

SBC have developed an online Google Map, a link to which is available from the Council's website and this map shows the locations of all our CCTV cameras. Freedom of Information Act requests, Subject Access Requests in Slough are very unusual likely because of the high levels of public support

13. How will you know if the particular camera system/hardware/software/firmware being considered does deliver the desired benefits now and in the future? It is good practice to review the continued use of your system on a regular basis, at least annually, to ensure it remains necessary, proportionate and effective in meeting its stated purpose. State how the system will continue to meet current and future needs, including your review policy and how you will ensure that your system and procedures are up to date in mitigating the risks linked to the problem.

The Council's CCTV Policy requires any Council officer or offical seeking to use CCTV to first consult with the CCTV SPOC (CCTV Centre Manager) beforehand. This approach delivers consistency of approch and good governance. The policy is available on the public website.

All cameras are subject to twice daily operational and functional testing and these results are recorded. Every camera is subject to a repair and maintencne regime 4 times a year plus when required when an operational deficiency is identified

An annual review and assessment takes place where an assessment of operational effectiveness and continued need is demonstrated. See our 'CCTV Scheme Evaluation Report 2019' for more info.

14. What future demands may arise for wider use of images and how will these be addressed? Consider whether it is possible that the images from the surveillance camera system will be processed for any other purpose or with additional technical factors (e.g. face identification, traffic monitoring or enforcement, automatic number plate recognition, body worn cameras) in future and how such possibilities will be addressed. Will the camera system have a future dual function or dual purpose?

As the cost of cameras has reduced and the image quality has increased there appears to be an ever-increasing demand for the installation of more CCTV cameras. This is often seen as a negative however, we believe that if the policies and procedures together with effective system management and operation is carried out in a fully compliant manner, more cameras equals greater public safety.

Slough Borough Council does not use Automatic Facial Recognition. ANPR is used to monitor and activate rising bollards to enforce a prohibition on the High Street

15. Have you considered the extent to which your surveillance camera system may interfere with the rights and freedoms conferred under the European Convention on Human Rights? When we consider data protection, our focus tends to be upon the potential to interfere with the Article 8 right to respect for private and family life. Surveillance undertaken in accordance with the law could, however, interfere with other rights and freedoms such as those of conscience and religion (Article 9), expression (Article 10) or association (Article 11). Summarise your assessment of the extent to which you might interfere with ECHR rights and freedoms, and what measures you need to take to ensure that any interference is necessary and proportionate.

Some of our CCTV cameras are installed within the public realm including in staff areas, public/ staff interfaces (where staff are in close personal contact with members of the public) shopping, retail, rest, recreation, play areas & parks and signage is present at all of these locations. Some of them are close to sites of religious worship however; the community supports these installations as they generally feel safer in areas where CCTV is in operation.

The expectation of privacy within the public areas mentioned above is already low however, we remain aware of the need to be ever more protective of the public's right to privacy and consider that in all that we do; especially when is sensitive family areas such as in parks.

The use of our CCTV in such areas is still considered as proportionate and does not contravene Articles (8), (9), (10) or (11) of the ECHR.

16. Do any of these measures discriminate against any particular sections of the community? Article 14 of the ECHR prohibits discrimination with respect to rights under the Convention. Detail whether the proposed surveillance will have a potential discriminatory or disproportionate impact on a section of the community. For example, establishing a surveillance camera system in an area with a high density of one particular religious or ethnic group.

The operation and management of the CCTV system does not intentionally discrtiminate against anyone or any specific part of our diverse community or on the grounds of gender, ethnicity, age, ability, religeous belief, sexual orientation.

Template Level Two

This Level 2 template is designed to give organisations a simple and easy to use format for recording camera locations, other hardware, software and firmware on their surveillance camera system, and demonstrating an assessment of risk to privacy across their system and the steps taken to mitigate that risk.

Principle 2 - The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.

When looking at the obligation under the code a risk assessment methodology has been developed to help organisations identify any privacy risks to individual or specific group of individuals (e.g. children, vulnerable people), compliance risks, reputational risks to the organisation and non-compliance with the Protection of Freedoms Act 2012 and/or the Data Protection Act 2018.

A system that consists of static cameras in a residential housing block will generally present a lower risk than a system that has multiple High Definition Pan Tilt and Zoom (PTZ) cameras. However, the DPIA should help identify any cameras (irrespective of the type) that may be directed at a more vulnerable area (e.g. a children's play area) and thus presenting a higher privacy risk. This approach allows the organisation to document a generic and methodical approach to any intrusion into privacy, catalogue your cameras by type and location, and finally identify any cameras that present specific privacy risks and document the mitigation you have taken. It also allows you to consider the risks associated with any integrated surveillance technology such as automatic facial recognition systems, along with security measures against cyber disruption of your system,

As an organisation that operates a surveillance camera system you will also be the controller of the personal data captured by its cameras. Under DPA 2018 (Sections 69-71), a data controller is under a legal obligation to designate and resource a data protection officer and to seek their advice when carrying out a DPIA.

An example of a risk assessment matrix is shown in **Appendix Two**.

When undertaking a DPIA, it is essential to be able to confirm where the organisation's cameras are sited. It is good practice for all organisations to maintain an asset register for all of their hardware (including cameras), software and firmware. This allows the system operator to record each site and system component in a manner to lead into the level two process.

If any new site or installation sits outside of the pre-defined fields, or additional integrated surveillance technologies are added, then new categories can be added as required

Overall step one and step two will cover the uses of hardware, software and firmware of the system. However, it may be contrary to the purpose of your surveillance camera system to publically list or categorise each individual asset.

Template – Level Two

Step 1 (definition of hardware, software and firmware including camera types utilised)

Cameras Specification: System operator owner should include below all camera types and system capabilities (e.g. static, PTZ, panoramic, ANPR) and their likely application and expected use. This will differ by organisation but should be able to reflect a change in camera ability or system functionality due to upgrade.

Please see example below:

ID	Camera types	Makes and models used	Amount	Description	Justification and expected use
1.	High-zoom PTZ	Bosch AutoDome 4000/5000/6000 digital and analogue, 360 Vision Systems Predator PTZ, Predator White light	80	Pan, tilt and zoom function. long zoom lenses, ideal for long distance monitoring	CCTV monitoring of staff and public spaces / amenities. Images are recorded and monitored at CCTV Centre. Along highways and public land. Cameras were installed for the prevention and detection of crime & disorder, for public safety, property security and the protection of staff and assets and all other permitted uses under DPA registration.
2.	HD static	Bosch Dome	5	HD static CCTV camera recirded at CCTv Centre	Used for surveillance of pedestrian pathways and entances, tunnels etc.. Images are recorded and monitored at CCTV Centre

Step 2 (location assessment)

Location: Each system operator/owner should list and categorise the different areas covered by surveillance on their system. This list should use the specifications above which ID (types) are used at each specific location.

CAT	Location type	Camera types used	Number	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
A.	Public open spaces, retail and recreational areas together with pedestrian footpaths and highways	1 & 2	48	24hrs	24hrs (only maximum 3 operators) – likely average patrol is a few minutes hourly	HD camera only include due to proximity to town HD cam

Step 3 (Cameras or functionality where additional mitigation required)

Asset register: It is considered to be good practice for all organisations to maintain an asset register for all of the components which make up their system. This allows the system owner to record each site and equipment installed therein categorised in a manner to lead into the level two process.

Please document here any additional mitigation taken on a camera or system to ensure that privacy is in line with the ECHR requirements.

Asset number	Reviewed	Camera type	Location category	Further mitigation/ comments (optional)
Cam1 to 85	07-2019	1 & 2	A	None

Step 4 (Mitigation for specific cameras and any integrated surveillance functionality that have high privacy risks)

Where there is a very high risk to privacy you may wish to conduct an extensive DPIA of specific installations or functionality and have it fully documented. Where you are unable to mitigate the risk adequately you **must** refer your DPIA to the ICO for review.

DPIA for specific installations or functionality

Camera number	All cameras
Camera location	All Areas

Privacy risk(s)	**Solution**	**Outcome** (Is the risk removed, reduced or accepted)	**Justification** (Is the impact after implementing each solution justified, compliant and proportionate to the aim of the camera?)
See SBC CCTV Privacy Policy			

Measures approved by:
Integrate actions back into project plan, with date and responsibility for completion

Name	
Date	

Residual risks approved by:
If you identify a high risk that you cannot mitigate adequately, you must consult the ICO before starting to capture and process images

Name	
Date	

DPO advice provided:
DPO should advise on compliance and whether processing can proceed

Name	
Date	
Summary of DPO advice	

DPO advice accepted or overruled by:
If overruled, you must explain your reasons

Name	
Date	
Comments	

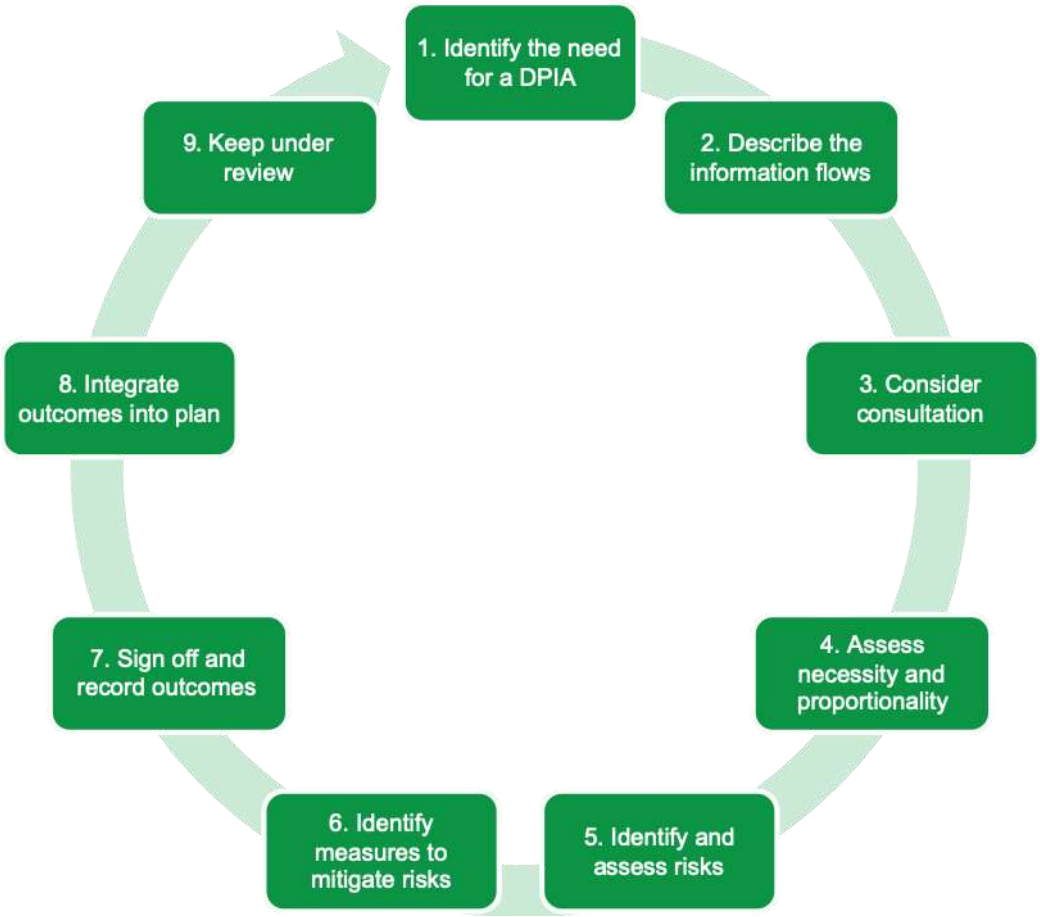
Consultation responses reviewed by:
If your decision departs from individuals' views, you must explain your reasons

Name	
Date	
Comments	

This DPIA will kept under review by:
The DPO should also review ongoing compliance with DPIA

Name	P Webster – CCTV & Careline Centre Manager
Date	09-2019

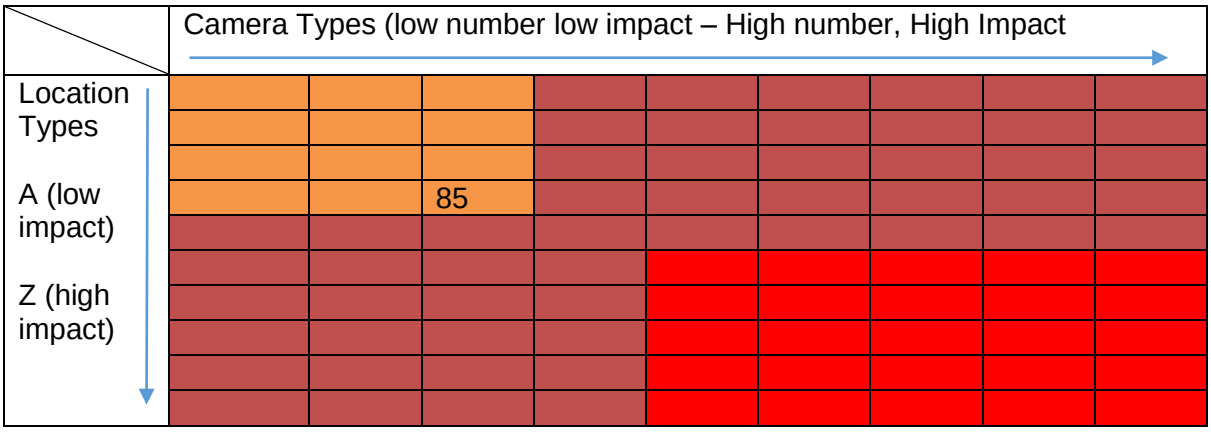
APPENDIX ONE: STEPS IN CARRYING OUT A DPIA



APPENDIX TWO: DATA PROTECTION RISK ASSESSMENT MATRIX

Scoring could be used to highlight the risk factor associated with each site or functionality if done utilising the risk matrix example shown below.

Matrix Example:



Be aware that use of any surveillance camera system with biometric capabilities, such as Automated Facial Recognition technology, is always likely to result in a high risk to the rights and freedoms of individuals and therefore a DPIA must always be carried out in respect of those systems before you process any personal data.

APPENDIX THREE: LEVEL 1

DESCRIBE THE INFORMATION FLOWS

Optional questions to help describe the collection, use and deletion of personal data.

It may also be useful to refer to a flow diagram or another way of explaining data flows.

5.1 How is information collected?

- ☒ CCTV camera
- ☐ Body Worn Video
- ☐ ANPR
- ☐ Unmanned aerial systems (drones)
- ☐ Stand-alone cameras
- ☐ Real time monitoring
- ☐ Other (please specify)

Using CCTV cameras

5.2 Does the system's technology enable recording?

☒ Yes ☐ No

Please state where the recording will be undertaken (no need to stipulate address just Local Authority CCTV Control room or on-site would suffice for stand-alone camera or BWV), and whether it also enables audio recording.

Those cameras installed close to the CCTV Centre are connected wirelessly using point to point 5.4Ghz links and recorded in the NVR rack in the server room. In other locations, the fibre connected cameras act as a node and wireless links backhaul video to the Centre through these nodes where they are recorded. Lastly, a number of sites (see separate list of sites) record images locally using secured remote systems and the Operators then connect into the remote sites using secure credentials to replay recorded images.

Is the recording and associated equipment secure and restricted to authorised person(s)? (Please specify, e.g. in secure control room accessed restricted to authorised personnel)

Operators connect into the remote sites using secure credentials. All of the CCTV equipment is located within our secure CCTV server room.

5.3 What type of transmission is used for the installation subject of this PIA (tick multiple options if necessary)

- ☒ Fibre optic
- ☒ Wireless (please specify below)
- ☒ Hard wired (apart from fibre optic, please specify)
- ☐ Broadband
- ☐ Other (please specify)

Most directly connected cameras are connected using coax cables (analogue cameras) and secure point to point fibre circuits. Those cameras installed close to the CCTV Centre are connected wirelessly using poin to point 5.4Ghz links. In other locations, the fibre connected cameras act as a node and wireless links backhaul video to the CCTV Centre through these nodes. Lastly, a number of sites record umages locally using secured remote systems and th Operators connect into the remote

sites using secure credentials.

5.4 What security features are there to protect transmission data e.g. encryption (please specify)

The entire central system network within the secure CCTV Centre server room is protected by a professional Juniper firewall and Juniper managed ethernet switches. These devices are all actively monitored for intrusion and performnce using Solar Winds CMS

5.5 Where will the information be collected from?

☒ Public places (please specify) ☐ Car parks

☐ Buildings/premises (external) ☐ Buildings/premises (internal public areas) (please specify)

Public open spaces, retail and recreational areas together with pedestrian footpaths and highways

☐ Other (please specify)

N/A

5.6 From whom/what is the information collected?

☐ General public in monitored areas (general observation) ☐ Vehicles

☐ Target individuals or activities (suspicious persons/incidents) ☐ Visitors

☐ Other (please specify)

Anyone in the area

5.7 What measures are in place to mitigate the risk of cyber-attacks which interrupt service or lead to the unauthorised disclosure of images and information?

The entire central system network within the secure CCTV Centre server room is protected by a professional Juniper firewall and Juniper managed ethernet switches. These devices are all actively monitored for intrusion and performnce using Solar Winds CMS

5.8 How is the information used? (tick multiple options if necessary)

☒ Monitored in real time to detect and respond to unlawful activities

☒ Monitored in real time to track suspicious persons/activity

☐ Compared with reference data of persons of interest through Automatic Facial Recognition software

☐ Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software

☐ Used to search for vulnerable persons

☒ Used to search for wanted persons

☒ Recorded data disclosed to authorised agencies to support post incident investigation by, including law enforcement agencies

☒ Recorded data disclosed to authorised agencies to provide intelligence

☐ Other (please specify)

Where a duley authorised DSA is received (under RIPA) our system is also used by police forces

5.9 How long is footage stored? (please state retention period)

31 days and then automatically deleted

5.10 Retention Procedure

Footage automatically deleted after retention period

☐ System operator required to initiate deletion

☐ Under certain circumstances authorised persons may override the retention period e.g. retained for prosecution agency (please explain your procedure)

When a request to protect video evidence from deletion is received from an authorised agency, it is copied to an Evidence Locker (secure hard disk folder) for safe keeping until either siezed or deleted manually

5.11 With which external agencies/bodies is the information/footage shared?

☒ Statutory prosecution agencies

☒ Judicial system

☒ Data subjects

☐ Local Government agencies

☐ Legal representatives

☐ Other (please specify)

Video image data can be shared with any authorised person/s, see SBC policy for more information

5.12 How is the information disclosed to the authorised agencies

☒ Only by onsite visiting

☒ Copies of the footage released to those mentioned above (please specify below how released e.g. sent by post, courier, etc)

☐ Offsite from remote server

☐ Other (please specify)

Where evidence is required for civil purposes (such as an insurance claim following a vehicle collision) we are prepared to release it to the insurers. It is despatched on a DVD using Royal Mail Special Delivery (recorded and signed for)

5.13 Is there a written policy specifying the following? (tick multiple boxes if applicable)

☒ Which agencies are granted access

☒ How information is disclosed

☒ How information is handled

☒ Recipients of information become Data Controllers of the copy disclosed

Are these procedures made public? ☒ Yes ☐ No

Are there auditing mechanisms? ☒ Yes ☐ No

If so, please specify what is audited (e.g., disclosure, production, accessed, handled, received, stored information)

CCTV Policy, procuderes, Google map of camera locations, disclosure, production, accessed, handled, received, stored information. Audit is by BS7958 annual audit

5.14 Do operating staff receive appropriate training to include the following?

☒ Legislation issues

☒ Monitoring, handling, disclosing, storage, deletion of information

☒ Disciplinary procedures

☒ Incident procedures

☒ Limits on system uses

☐ Other (please specify)

All staff are trained and qualified in all aspects of their role

5.15 Do CCTV operators receive ongoing training?

☒ Yes ☐ No

5.16 Are there appropriate signs which inform the public when they are in an area covered by surveillance camera systems?

☒ Yes ☐ No