



**SURVEILLANCE CAMERA
COMMISSIONER**

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Information Commissioner's Office

Data protection impact assessments
template for carrying out a data
protection impact assessment on
surveillance camera systems



Project name: Crime & anti-social Behaviour monitoring at Water End, Renhold

Data controller(s): Councillor Warwicker

This DPIA template should be completed with reference to the guidance provided by the Surveillance Camera Commissioner and the ICO. It will help you to identify whether the use of surveillance cameras is appropriate for the problem you wish to address, assess the risks attached to your project and form a record of your decision making.

1. Identify why your deployment of surveillance cameras requires a DPIA¹:

- | | |
|---|--|
| <input type="checkbox"/> Systematic & extensive profiling | <input type="checkbox"/> Large scale use of sensitive data |
| <input type="checkbox"/> Public monitoring | <input type="checkbox"/> Innovative technology |
| <input type="checkbox"/> Denial of service | <input type="checkbox"/> Biometrics |
| <input type="checkbox"/> Data matching | <input type="checkbox"/> Invisible processing |
| <input type="checkbox"/> Tracking | <input type="checkbox"/> Targeting children / vulnerable adults |
| <input type="checkbox"/> Risk of harm | <input checked="" type="checkbox"/> Special category / criminal offence data |
| <input type="checkbox"/> Automated decision-making | <input type="checkbox"/> Other (please specify) |

CCTV deployment at a secluded rural area subject to frequent Fly-tipping, drug use and residential outbuilding intrusions.

2. What are the timescales and status of your surveillance camera deployment? Is this a proposal for a new deployment, or the expansion of an existing surveillance camera system? Which data protection regime will you be processing under (i.e. DPA 2018 or the GDPR)?

New deployment. 24 hour monitoring from fixed location. Data Protection Regime is DPA 2018

Describe the processing

3. Where do you need to use a surveillance camera system and what are you trying to achieve?

Set out the **context** and **purposes** of the proposed surveillance cameras or the reasons for expanding an existing system. Provide evidence, where possible, including for example: crime statistics over an appropriate time period; housing and community issues, etc.

The camera will be sited on a fixed pole at the entrance splay of Water End (namely, St. Neots rd and Water Lane junction). The site is secluded and rural, and there is no street lighting. There is frequent fly-tipping during daylight and nighttime hours which is reported to the Borough Council for removal. There has been reports of drug dealing at the junction, and drug paraphernalia has had to be removed from public pathways by specialist Borough Council workers in the past. There have also been incidents of intrusion onto and into properties in the hamlet.

The purpose of the project is, initially, to deter the aforementioned activities; but also to collect evidence to enable enforcement by either Bedford Borough Council or Bedfordshire Police.

¹ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/>

4. Whose personal data will you be processing, and over what area? Set out the **nature** and **scope** of the personal data you will be processing. Who are the data subjects, and what kind of information will you be collecting about them? Do they include children or vulnerable groups, and what is the scale and duration of the processing?

The CCTV camera will monitor the local junction area and a length of St. Neots rd (max 150m IR) on a 24 hour basis. It is focused on the public road and footpath and does not collect data from adjacent residential buildings or land. The camera will record the movements of vehicles and pedestrians within this area. Residents movements will be recorded as will those of legitimate and suspicious visitors. The information collected will be images and vehicle registrations. Children and vulnerable groups are not expected to be impacted specifically.

5. Who will be making decisions about the uses of the system and which other parties are likely to be involved? Will you be the sole user of the data being processed or will you be sharing it with other organisations or agencies? Record any other parties you would disclose the data to, for what purposes, and any relevant data sharing agreements. Note that if you are processing for more than one purpose you may need to conduct separate DPIAs.

The Renhold Parish Council, the Parish Clerk (Contact Point) and the Responsible Officers appointed by the Council. The Parish Council is the sole user and any data will only be shared with Bedfordshire Police or Bedford Borough Council in the event of an incident occurring.

6. How is information collected? (tick multiple options if necessary)

- | | |
|---|---|
| <input type="checkbox"/> Fixed CCTV (networked) | <input type="checkbox"/> Body Worn Video |
| <input type="checkbox"/> ANPR | <input type="checkbox"/> Unmanned aerial systems (drones) |
| <input checked="" type="checkbox"/> Stand-alone cameras | <input type="checkbox"/> Redeployable CCTV |
| <input type="checkbox"/> Other (please specify) | |

Tracking dome camera.

7. Set out the information flow, from initial capture to eventual destruction. You may want to insert or attach a diagram. Indicate whether it will include audio data; the form of transmission; the presence of live monitoring or use of watchlists; whether data will be recorded; whether any integrated surveillance technologies such as automatic facial recognition are used; if there is auto deletion after the retention period. You may have additional points to add that affect the assessment.

Data collected is solely visual. It is stored on an internal SSD card, which has a maximum memory duration of approx 5 days, at which point existing data images are over-written. There are no other integrated technologies. Data is only accessed from the SSD memory in the event of a reported incident, and this will be via a SIM card which a responsible officer will use. The downloaded data will

be stored on a laptop computer (property of Renhold Parish Council). This storage location will hold the data for a maximum period of 1 year. Audits will occur annually to delete expired data unless notified otherwise by Beds Borough Council and/or Bedfordshire Police.

8. Does the system's technology enable recording?

Yes No

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

Recording is onto an SSD card housed in the camera.

9. If data is being disclosed, how will this be done?

- Only by on-site visiting
- Copies of footage released (detail method below, e.g. encrypted digital media, via courier, etc)
- Off-site from remote server
- Other (please specify)

If recordings are required of incidents they will be downloaded remotely and forwarded to the appropriate authority as either video files or still images.

10. 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 processing of biometric data, such as facial recognition.
- Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software
- Linked to sensor technology
- Used to search for vulnerable persons
- Used to search for wanted persons
- Recorded data disclosed to authorised agencies to support post incident investigation, including law enforcement agencies
- Recorded data disclosed to authorised agencies to provide intelligence
- Other (please specify)

Consultation

11. Record the stakeholders and data subjects you have consulted about the deployment, together with the outcomes of your engagement.

Stakeholder consulted	Consultation method	Views raised	Measures taken
Mr G. Prigmore	email	No Concerns	N/A
Mr J. Gill	email	No comments	N/A
Ms C. Barker	email	No Comment	N/A
Mrs E. Wheatley	email	No issues with project	N/A
Mrs J. Wilkerson	email	No Comment	N/A
Mrs W. Warwicker		No Comment	N/A
Mr J Polhill	Site visit	No comment	N/A

Consider necessity and proportionality

12. What is your lawful basis for using the surveillance camera system? Explain the rationale for your chosen lawful basis under the relevant data protection legislation. Consider whether you will be processing special categories of data.

Legitimate Interest. Surveillance of unlit secluded rural area with the purpose of prevention and detection of crime.

13. How will you inform people that they are under surveillance and ensure that they are provided with relevant information? State what privacy notices will be made available and your approach to making more detailed information available. Consider whether data subjects would reasonably expect to be under surveillance in this context.

CCTV surveillance signage will be placed on site and a Privacy Policy will be available on the Parish Council web site along with all other documentation relating to the deployment.

14. How will you ensure that the surveillance is limited to its lawful purposes and the minimum data that is necessary for those purposes? Explain the adequacy and relevance of the data you will be processing and how it is limited to the purposes for which the surveillance camera system will be deployed. How will you know if it is delivering the benefits it has been deployed for?

Access to equipment will be limited to appointed Responsible Officers. Data will only be downloaded and stored onto Parish Council equipment in the event of a notified suspicious activity or physical event. Data images may help identify the perpetrators of illegal/antisocial acts. Collected data is limited to 5 days storage on camera and then overwritten. Benefits will be determined by monitoring levels of illegal/antisocial behaviour via local resident feedback.

15. How long is data stored? (please state and explain the retention period)

Data stored for apprx 5 days on camera system.

16. Retention Procedure

- Data 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)

Downloaded data required for enforcement will be stored for 1 year and then deleted unless enforcing authority requests otherwise.

17. How will you ensure the security and integrity of the data? How is the data processed in a manner that ensures appropriate security, protection against unauthorised or unlawful processing and against accidental loss, destruction or damage? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Only authorised Responsible Officers will have access to the system. Any data downloads will be stored on the Parish Council's laptop computer, access, to which, is restricted. The laptop has appropriate antivirus and firewall software installed.

18. How will you respond to any subject access requests, the exercise of any other rights of data subjects, complaints or requests for information? Explain how you will provide for relevant data subject rights conferred under the legislation. 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.

Requests/ complaints will be made to the system's 'contact point' - the Parish Clerk - in writing, verbally or via social media. The individual making a request will be asked to state the period and location for which they wish to receive images, and to provide personal identification information. Requests will be responded to without delay and within a time period of 1 month upon identification confirmation. Data will be provided in commonly utilised video or still image formats.

19. What other less intrusive solutions have been considered? You 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 continuous? Where you have considered alternative approaches, provide your reasons for not relying on them and opting to use surveillance cameras as specified.

The operation needs to be 24 hour. Other than increased police patrols or employing private security patrols, there are no other mitigating measures that would achieve the purpose of the project.

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

The agencies that are granted access

How information is disclosed

How information is handled

Are these procedures made public? Yes No

Are there auditing mechanisms? Yes No

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

Annual audit to ensure stored data (if any) is deleted after the appropriate time scale. Calender entries to laptop will alert deletion dates which fall outside of audit.

Identify the risks

Identify and evaluate the inherent risks to the rights and freedoms of individuals relating to this surveillance camera system. Consider, for example, 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? Could it interfere with other human rights and freedoms such as those of conscience and religion, expression or association. Is there a risk of function creep? Assess both the likelihood and the severity of any impact on individuals.

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Recording of residents and/or vehicles, and their movements around the junction area of St. Neots Rd and Water Lane.	Remote, possible or probable Remote	Minimal, significant or severe Minimal	Low, medium or high Low
Recording of non-residents and/or vehicles, and their movements and activities around the junction area of St. Neots Rd and Water Lane	Remote	Minimal	Low

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

Address the risks

Explain how the effects of privacy enhancing techniques and other features mitigate the risks you have identified. For example, have you considered earlier deletion of data or data minimisation processes, 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? What security features, safeguards and training will be in place to reduce any risks to data subjects. Make an assessment of residual levels of risk.

Note that APPENDIX ONE allows you to record mitigations and safeguards particular to specific camera locations and functionality.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk			
Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
	Eliminated reduced accepted	Low medium high	Yes/no

Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
	Eliminated reduced accepted	Low medium high	Yes/no

Authorisation

If you have not been able to mitigate the risk then you will need to submit the DPIA to the ICO for prior consultation. [Further information](#) is on the ICO website.

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion.
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.
DPO advice provided by:		DPO should advise on compliance and whether processing can proceed.
Summary of DPO advice		
DPO advice accepted or overruled by: (specify role/title)		If overruled, you must explain your reasons.
Comments:		
Consultation responses reviewed by: Renhold Parish Council		If your decision departs from individuals' views, you must explain your reasons.
Comments: The residents affected by the sighting of the CCTV system in Water End are supportive of the project and have no concerns regarding the recording of their images as they traverse the surveilled area in the course of their daily lives.		
This DPIA will be kept under review by: Renhold		The DPO should also review

Date and version control: 19 May 2020 v.4

Parish Council		ongoing compliance with DPIA.
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APPENDIX ONE

This template will help you to record the location and scope of your surveillance camera system and the steps you've taken to mitigate risks particular to each location.

Location: Each system operator/owner should list and categorise the different areas covered by surveillance on their system. Examples are provided below.

Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
Town centre	All	250	24hrs	24hrs (only maximum 3 operators) – likely average patrol high hourly	The privacy level expectation in a town centre is very low; our town centres are well signed with appropriate signage for CCTV its use and purpose with contact details.
Public car park	1, 5, 6	100			
Parks					HD camera only include due to proximity to town HD cam
Play areas					
Housing blocks internal	1, 2	200	24hrs (calendar month)	Limited due to the fact that most are static cameras	High level asb historical problems (please see statistical assessment in annual review)
Housing estate (street)					
Residential street					Cameras are installed here to respond to high crime trends, deal with the fear of crime

APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

Use this risk matrix to determine your score. This will highlight the risk factors associated with each site or functionality.

Matrix Example:

	Camera Types (low number low impact – High number, High Impact)								
Location Types									
A (low impact)									
Z (high impact)									

NOTES

The risks associated with the operation of the CCTV in the 1 specified location are rated as LOW (Level 1 in both instances).