



## Privacy Impact Assessment

### Conducting a privacy impact assessment on surveillance camera systems (CCTV)

Principle 2 of the surveillance camera code of practice 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 conducting a privacy impact assessment (PIA) before the system is installed and when a new camera is being added on to an existing system. This will assist in managing any privacy issues the use of the surveillance system might have.

The PIA should include the following information:

- *An outline of the problem the surveillance camera is trying to resolve*
- *Why a surveillance camera system is considered to be the most effective way to solve the issues*
- *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 proportionality, legality, accountability and necessity. Any interference by a public authority of an individual's rights must be justified.

Therefore the following questions must be considered as part of a PIA:

- *Is the surveillance activity established on a proper legal basis and is it undertaken in accordance with the law?*
- *Is the surveillance activity necessary to address a pressing need, such as public safety, crime prevention or national security?*
- *Is it justified in the circumstances?*
- *Is it proportionate to the problem that it is designed to deal with?*

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

Otherwise please proceed to complete the template below.

## Privacy Impact Assessment

Location of surveillance camera system being assessed:

Date of assessment:

Review date:

Name of person responsible:

Data Protection Act 1998 and Surveillance Camera Code of Practice
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1	What is the organisation's purpose for using the CCTV and what are the issues that the system aims to address?	Prevention and detection of crime and disorder and public safety. To also assist in the overall management of
2	Can CCTV technology realistically deliver these benefits?	<p>Use of CCTV does provide evidential and other data that can be used to detect and or provide independent evidence for criminal or civil matters.</p> <p>Proactive use by monitoring CCTV enhances the work of the emergency services and others in more effective operational management of incidents</p>
3	What are the views of those who will be under surveillance?	<p>Swindon corporate system is highly effective and fully certificated by industry inspectorates. It enjoys local public support from members and residents.</p> <p>An independent inspection scheme in addition to the formal audits provides extra reassurance to the public.</p>
4	Have other less privacy-intrusive solutions such as improved lighting been considered?	The requirement for CCTV is assessed through the use of an operational requirement that includes consideration of other options.
5	What are the benefits to be gained from using CCTV?	<p>Public CCTV usage allows council and emergency services to provide operational support and recorded evidence.</p> <p>Proactive monitoring has proven to be highly effective in the detection of incidents that are notified to the relevant services.</p> <p>Crime and other performance statistics published on the council website.</p>
6	What are the privacy issues arising from this surveillance camera system?	<p>Privacy issues are</p> <ol style="list-style-type: none"> <li>1.Overlooking private space</li> <li>2.Recording of personal DATA</li> <li>3.Retention and deletion of data</li> <li>4.Excessive or inappropriate monitoring</li> <li>5.Data handling and provision</li> </ol>
7	What privacy design features will be adopted to reduce privacy intrusion?	<p>To ensure privacy of data the system has the following safeguards.</p> <ol style="list-style-type: none"> <li>1. Secure premises and restricted access</li> <li>2. Automated digital data deletion process</li> <li>3. Evidence handling procedures</li> <li>4. Privacy masking on cameras</li> </ol>

		<p>5. Regular privacy checks</p> <p>6. Inspectorate certification and audit</p> <p>7. System and network security processes</p> <p>8. Staff training and supervision and processes</p>
8	What organisations will be using the CCTV images and who will take legal responsibility for the data under the Data Protection Act 1998?	<p>Data users are as notified in the Council's DPA registration that includes</p> <p>1. Data subjects</p> <p>2. Statutory prosecuting authorities</p> <p>3. Clients and authorised investigators. The system has SLAs reflecting these standards with its clients</p>
9	Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?	<p>The system records images in high quality and dependant on the type and location of individual cameras and the capabilities are able to provide images of individuals.</p> <p>Some fixed cameras are set to provide this level and others for general overview of the area of coverage.</p> <p>Moveable (PTZ) pan, tilt, zoom cameras have the ability to zoom in at great distance and are used proactively to gather identities of individuals as required.</p> <p>However pre-set positions are usually set to an overview of camera coverage area to maximise observational monitoring and minimise personal Data capture.</p>
10	Will the CCTV equipment being installed and the system of work being adopted be sustainable? Is there sufficient funding for the scheme?	<p>The corporate system has a sustainable revenue budget through income recharging of services and agreed SLA's with customers.</p> <p>The corporate system has a capital replacement budget and programme in place that is reviewed regularly.</p> <p>Any new cameras to the system must have an associated budget approved before they are installed.</p>
11	Will the particular system/equipment being considered deliver the desired benefit now and in the future?	<p>The corporate system has been designed for resilience and future compatibility in order to ensure that any part of the system may be replaced or upgraded with minimal impact and cost.</p> <p>The corporate system is continually being refreshed technically to ensure maximum effectiveness and take advantage of future technology.</p>
12	What future demands may arise for wider use of Images and how will these be addressed?	<p>Developments are in place for the provision of remote live images to authorised users and for remote data provision by secure means.</p>
<b>Human Rights Act 1998</b>		
1	Is the system established on a proper legal basis and is it operated in accordance with the law?	<p>The corporate system was established under sec 115 of the crime and disorder act. It operates within the legislation requirements and is fully accredited by the industry inspectorates to all required standards.</p>

2	Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?	<p>The council has invested in the use of public CCTV to assist its statutory requirements to reduce crime, disorder, enhance its ability to manage emergency incidents and improve public safety.</p> <p>The continued success of the corporate system is performance managed and externally accredited</p>
3	Is it justified in the circumstances?	Correct use of public CCTV has shown to be of considerable operational and evidential benefit to the authority and emergency services and is supported by the local residents and council members.
4	Is it proportional to the problem that it is designed to deal with?	<p>The corporate system and the way it operates is deemed proportional by its professional accreditations and its proven success.</p> <p>There are measures in place to protect personnel privacy ensure that the system always operates with due regard to the public right of privacy where ever possible</p>
5	Do any of these measures discriminate against any particular sections of the community?	The corporate system and its many management processes ensure that discrimination in all its forms is not breached and staff are fully trained in legislation requirements

