

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



**Project name:** Halesworth CCTV

**Data controller(s):** Nick Rees (Town Clerk)

**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 DPIA<sup>1</sup>:**

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<sup>1</sup> <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/>

- |   |   |
|---|---|
| <input type="checkbox"/> Systematic & extensive profiling | <input type="checkbox"/> Large scale use of sensitive data        |
| <input checked="" 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 type="checkbox"/> Special category / criminal offence data |
| <input type="checkbox"/> Automated decision-making        | <input type="checkbox"/> Other (please specify)                   |

The CCTV network of cameras will record, for a limited period before automatic over writing, public shopping areas in the town, mainly in the Thoroughfare (High Street) and Market Place

**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)?

The CCTV network has been approved by the Planning Authority and approved by the Town Council. The equipment is being installed and the system will be live at the end of November 2020

### 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 Police, due to cutbacks, have drastically reduced the Police presence in the town. There have been some minor incidents in the last couple of years but the primary purpose of the CCTV is to be a preventative measure. The Police provided a specialist PCSO to assist and were in favour of this approach.

**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 cameras will cover the Thoroughfare and the one way section of Bridge Street, the Thoroughfare in it's entirety continuing on to parts of London Road up to the Swan P.H. The network will also have one camera in the Market Place. The purpose is to deter crime but as part of the process, the general public and vehicles will be recorded temporarily. These recordings will be automatically erased/overwritten after a period of 21 days, unless the police specifically wishes to retain a section of footage following a crime.

**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 only users will be the Town Clerk (Nick Rees) and the Assistant Clerk but only for purposes of checking the equipment is working, the system will not be monitored. No other groups or individuals will be given access except the Police and then only on receipt of the access form identifying the officer and a crime number

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

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

**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.

Camera feed is recorded automatically on to a hard disk, this recording can be accessed remotely from the Clerk's Office. the APNR camera will record the number plates automatically. There is no intended use for this data except to aid the Police is a crime is committed. All recordings are automaically erased after 21 days.

### 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.

The recording box is located in the Thoroughfare at a private address.

### 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)

Only by on-site request from the Police with the necessary forms - see 5

### 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)

Police only

## 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
Police	HTC CCTV working groups meetings	In favour	CCTV specialist PCSO consulted
Public	Public forum meetings. public Town Council meetings, social media, newsletters, local paper and via the Planning Application process	Of those who expressed an opinion were mostly in favour	Updated through social media and news outlets. One specific concern regarding one camera location was initially dealt with by offering to move it but it has since been removed from the system
Businesses	Public forum meetings. public Town Council meetings, social media, newsletters, local paper and via the Planning Application process	All those who expressed an opinion were in favour	Updated through social media and news outlets


## 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.

Crime prevention, there are no special categories

**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 notices will be placed in the public areas under surveillance

**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?

For the vast majority of the time the CCTV footage will not be accessed at all. Only following a crime will the Police be able to have access to assist them in their investigations.

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

A maximum of 21 days

## **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)



**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?

There will be no transfer of data and it is not processed by anyone

**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.

A subject access request by an individual will only be attempted if the recording is still available at the time of the request under the Council's procedure for SAR.

**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 only other effective measure to deter crime is an active Police presence but at this time of reduced services this is not a realistic alternative

**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)

HTC CCTV Policy