



**SURVEILLANCE CAMERA
COMMISSIONER**

PRIVACY IMPACT ASSESSMENT

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The template below is designed to assist you in carrying out a privacy impact assessment (PIA).

Privacy Impact Assessment screening questions

These questions are intended to help you decide whether a PIA is necessary.

Camera location (if applicable)

Camera Number (if known)

Camera type (PTZ, Static etc.)

Is CCTV system covered by ICO registration number? Yes No

If so, please state

Has the Surveillance Camera Code of Practice self-assessment tool been used to assist in completion of this PIA? Yes No

Will this proposed installation be part of an existing CCTV system certified to the Surveillance Camera Code of Practice? Yes No

Checklist

Answering 'yes' to any of the following questions is an indication that a PIA would be a useful exercise. You can expand on your answers as the project develops if you need to.

Introduction of a new surveillance camera system or additional camera (includes static cameras) which can collect new personal information about individuals Yes No

Changing location and/or field of view of an existing camera Yes No

Upgrading cameras which can obtain additional views or enhanced views which may impact on privacy e.g. HD cameras, IR lighting, more powerful lenses, 360 degree cameras Yes No

Introduction of new technology that may affect privacy (e.g. Automatic Number Plate Recognition, Body Worn Video, Automated Recognition Technology, Unmanned Aerial systems (Drones) or similar Yes No

If so, please state

Using re-deployable cameras (to be completed for every new deployment) Yes No

Installation of the camera results in decisions or action against individuals in ways that can have significant impact on them (this would include, fine, notifying police, patching through images of suspects to police control rooms and Regulation of Investigatory Powers Act 2000 – RIPA) Yes No

Is the information collected about individuals of a kind likely to raise privacy concerns or expectations? For example, criminal records or other information that people would consider particularly private. (Note: may include radio transmissions from the CCTV Control room to store watch and pub watch systems. These regularly mention individuals and their previous convictions which can be heard by members of the public as well as suspect. The risk would need to be identified in the PIA and the solutions addressed.) Yes No

Introduction of Wi-Fi, microwave, GSM, airwave transmission etc. Yes No
(Is it encrypted?)

If so, please state

Hartlepool's CCTV system uses a combination of the Council's own secure internal optical fibre network, secure Virtual Private Networks on the Council's own I.T network, and Council owned encrypted wireless radio links.

Extending periods of recording Yes No

Upgrade in recording frames per second (increase in image capture) Yes No

Analogue to digital recording Yes No

Where other agencies/organisations are involved in activities where there is potential for privacy to be compromised, e.g. monitoring, handling, processing, sharing data/images etc. Yes No

Any alteration to the way images and data are handled, viewed, processed, disclosed, shared, disposed, retrieved, accessed, stored Yes No

Any other process or use which increases the risk to privacy Yes No

If so, please give details

The Council is installing a number of High Definition CCTV cameras.

Does the introduction of a camera system or individual camera increase the risks to the Organisation? E.g. potential non-compliance with data protection or other legislation, legal actions by individuals, etc. Yes No

If you tick 'YES' to any of the above, please complete the following PIA. If in doubt it would be advisable to complete a PIA anyway.

Privacy Impact Assessment Template

This template is an example of how you can record the PIA process and results. You can start to fill in details from the beginning of the project, after the screening questions have identified the need for a PIA.

1. Identify the need for a PIA

The following are examples of some of the possible aims of the installation/project. If applicable tick one or more of the following aims then briefly explain what the benefits will be to the organisation, individuals and other parties. If there are other aims please detail and explain.

You can refer to other documentation related to the proposed installation or project e.g. Operational Requirement, business case, project proposal, feasibility survey etc.

1.1 Aims

- a. reducing the fear of crime
- b. deterring and preventing crime
- c. assisting in the maintenance of public order and reducing offences
- d. provide high quality evidence which may assist in the detection of crime and the apprehension and prosecution of offenders
- e. protecting property
- f. providing assistance with civil claims
- g. providing assistance with issues relating to public safety and health
- h. providing assistance and reassurance to the public in emergency situations
- i. Assist with traffic management
- j. Recognition of number plates (ANPR)
- k. Other, please specify

- (l) Protection and Safeguarding of Vulnerable Persons, Victims and Localities
- (m) Protection of National Security
- (n) The Protection of the Rights and Freedoms of Others
- (o) Protection of Hartlepool Borough Council assets and personnel
- (p) Management of public space areas and events
- (q) Assisting Hartlepool Borough Council, Cleveland Police and other Statutory and Enforcement Agencies in carrying out their statutory, and investigatory, regulatory, licensing, and enforcement duties, (including the administration of their personnel)
- (r) Assisting in Traffic Management and in Highway and Environmental Enforcement
- (s) Assisting the Emergency Services and Emergency Planning in the management of emergency incidents

1.2 Benefits

Having identified the aims please explain the benefits to your organisation, to individuals and to other parties. This could include such things as reduction in crime and offences, reduction in fear of crime, detection of anti-social behaviour etc. The benefits should be capable of being measured and not anecdotal (If you have completed an operational requirement (OR), as recommended, in relation to this PIA please refer to the OR for risk analysis)

- (a) Crime prevention
- (b) Reduction in crime and disorder
- (c) Reduction in substance misuse

- (d) Decreased costs to Public Services
- (e) Increased guilty pleas of offenders
- (f) Increased safeguarding of victims, vulnerable persons and localities from harm
- (g) Decreased fear of crime by local residents
- (h) Increased confidence in public services
- (i) Improved reputation of Hartlepool Borough
- (j) Improved management of emergency incidents by Emergency Services and Emergency Planning

1.3 Summarise why the need for a PIA was identified

Completion of the screening questions will assist in identifying the need for a PIA.

Possible needs might include:

- a. Capture of new personal data/images
- b. New or additional locations/areas which have potential for privacy implications
- c. Use of new technology which is capable of capturing enhanced images e.g. BWV, automated recognition, 360 degree views, higher powered equipment, etc
- d. Surveillance camera systems with audio recording capability e.g. BWV
- e. Alteration to the way images and data are handled, viewed, processed, disclosed, shared, disposed, retrieved, accessed, stored
- f. Use of technology which captures vehicle registration numbers (ANPR)
- g. Other, please specify

2. Describe the information flows

You should describe the collection, use and deletion of personal data here and it may also be useful to refer to a flow diagram or another way of explaining data flows.

2.1 How is information collected?

- CCTV camera
- ANPR
- Stand-alone cameras
- Other (please specify)
- BWV
- Unmanned aerial systems (drones)
- Real time monitoring

N/A

2.2 Does the systems 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)

Hartlepool Borough Council Community Monitoring Centre. (CCTV Centre)

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)

Yes. The Community Monitoring Centre is a restricted access, target hardened, and secure facility which is not open to the public. Only authorised persons are permitted access.

2.3 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)

Council owned encrypted radio links

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

Council owned dedicated CCTV fibre optic network
Council owned encrypted radio links
Virtual Private Networks on the Council's I.T network

2.5 Where will the information be collected from?

- Public places (please specify)
- Car parks
- Buildings/premises (external)
- Buildings/premises (internal public areas) (please specify)

Security cameras are located inside the below buildings in areas accessible by staff and the public. No cameras are located in private or sensitive areas.
(a) Civic Centre
(b) Mill House Leisure Centre

- Other (please specify)

2.6 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)

Shop watch scheme members and retail premises
Pub watch scheme members and licensed premises

2.7 Why is the information being collected? (Please refer to additional documentation where available)

- Crime prevention and detection
- Traffic control purposes
- Parking enforcement
- Intelligence
- Missing person(s)
- Other (please specify)

(a) Protection of vulnerable persons at risk in public areas
(b) Assisting Hartlepool Borough Council, Cleveland Police and other Statutory and Enforcement Agencies in carrying out their statutory, and investigatory, regulatory, licensing, and enforcement duties. (including the administration of their personnel)

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

- Used by CCTV operators to detect and respond to unlawful activities in real time
- Used by CCTV operators to track and monitor suspicious persons/activity
- Used to search for vulnerable persons
- Used to search for wanted persons
- Used to support post incident investigation by authorised agencies, including judicial system
- Used to provide intelligence for authorised agencies
- Other (please specify)

Used to assist Emergency Services and Emergency Planning in emergency incident management
Used to monitor and manage public events
Staff management and oversight

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

Images are stored by the Council for 31 days

2.10 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)

The CCTV Service operates a process where any images that are required to be kept for longer than 31 days are saved on request onto both a Working Copy and a Master Copy external storage device. Both of these devices are then provided to the requesting authorised person/agency along with a witness statement from the CCTV operator. The requesting person/agency is required to complete a CCTV Images Disclosure Form. Image release to statutory agencies is authorised by the duty CCTV operator. Image release to members of the public, insurance companies and solicitors is authorised by the Council's Data Protection Officer. Once these external storage devices are handed over to the Requester no images are retained by the Council.

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

- Statutory prosecution agencies
- Local Government agencies
- Judicial system
- Legal representatives
- Data subjects
- Other (please specify)

(a) Agencies with a duty for civil and criminal investigatory, regulatory, licensing, and enforcement duties. For example; Housing Associations, Hartlepool Borough Council Anti-social Behaviour Unit, Housing Team, Trading Standards, Highways, Civil Enforcement, Child and Adult Services, and Public Protection.

(b) Solicitors

(c) Insurance Companies

2.12 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)

(a) Images are disclosed by onsite visiting and is also sent by post and courier as appropriate.

(b) A mirror/slave monitor in Cleveland Police Control Room and Middleton Grange Shopping Centre CCTV Control Room displays the live images currently being viewed on the primary monitor in the Council's CCTV Centre. Cleveland Police and Middleton Grange have no recording ability of this images.

2.13 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)

All of above. The Community Monitoring Centre manager carries out random spot checks of the records held by the Community Monitoring Centre.

2.14 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)

N/A

2.15 Do CCTV operators receive ongoing training?

Yes No

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

Yes No

3. Consultation requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted internally and externally? How will you carry out the consultation?

You can use consultation at any stage of the PIA process. It will be necessary to concentrate any consultation into 'privacy issues'.

Note: there are guidelines on consultation for the public sector issued by the Cabinet Office and elsewhere in this guidance.

3.1 Who have you consulted with? (tick multiple options if necessary)

Internal Consultations

- | | |
|---|--|
| <input checked="" type="checkbox"/> Data Protection officer | <input checked="" type="checkbox"/> Engineers, developers, designers, installers |
| <input checked="" type="checkbox"/> Information Technology | <input checked="" type="checkbox"/> Planning |
| <input type="checkbox"/> Procurement | <input type="checkbox"/> Data Processors |
| <input type="checkbox"/> Corporate governance/Compliance | <input type="checkbox"/> Research, analysts and statisticians |
| <input checked="" type="checkbox"/> Senior management | <input type="checkbox"/> Other (please specify) |

N/A

External Consultations (tick multiple options if necessary)

- | | |
|--|--|
| <input checked="" type="checkbox"/> General public | <input checked="" type="checkbox"/> Local residents |
| <input checked="" type="checkbox"/> Business | <input type="checkbox"/> Education establishments |
| <input type="checkbox"/> Neighbourhood panels | <input checked="" type="checkbox"/> Other (please specify) |

Elected Members

3.2 How did you undertake the consultation with the above (e.g. focus groups, on-line public survey, public meetings, targeted mail survey, etc)? (please explain)

Questionnaires
Public Meetings

3.3 Is feedback available to view?

- Yes No

3.4 What feedback did you have and have you acted on it? (please explain or attach results)

When the Council has installed CCTV cameras over the last 23 years it has received very positive feedback from the vast majority of residents. The most frequent request from residents is the installation of more CCTV cameras in problem areas. Due to the historical nature of these previous consultations no records now exist.

In 2008 Hartlepool Borough Council's Viewpoint Survey Panel of 1000 local residents showed that 93% of respondents were supportive of the Public Space CCTV system, and that 50% of respondents said that CCTV cameras made them feel safer.

In 2017, 225 questionnaires were sent out under a consultation for 3 new Public Space CCTV cameras. A total of 15 questionnaires were returned - 14 were in favour and 1 was against the proposal. (due to a concern over house prices)

4. Identify the privacy and related risks

Below are some suggested risks and solutions. Feel free to use some or all of them or some of your own.

The below table provides some examples of possible privacy risks related to the use of a CCTV system. Operators can use this list as a starting point; however, not all of these risks may apply to all CCTV systems or all PIAs.

Identify the key privacy risks and the associated compliance and corporate risks. Larger-scale PIAs might record this information on a more formal risk register. Remember that the aim of a PIA is not to completely eliminate the impact on a privacy risk. The options in dealing with the risks are to eliminate, reduce or simply accept them.

Privacy issue	Risk to individuals	Compliance risk	Associated organisation / corporate risk
Collection exceeds purposes of CCTV system	New surveillance methods may be unjustified intrusion on persons privacy	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Retention of images/information for longer than necessary	Owner retaining personal images/information longer than necessary	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Lack of policies and procedures and mechanisms	No policy which details how personal data handled, stored, disclosed etc.	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Lack of signage	Public not made aware that they are entering an area monitored by surveillance system	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Images released to incorrect/appropriate persons	Personal data released to wrong person/inappropriate person	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions
Loss of Images	Personal data not available	Non-compliance with Data Protection, Human Rights legislation	Loss of reputation Fines and sanctions

Privacy issue	Risk to individuals	Compliance risk	Associated organisation / corporate risk

5. Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

Note: please mark any 'privacy by design' solutions with an asterisk *

Risk	Solution(s)	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?
Collection of images/information exceeds purposes	Staff trained on how to restrict collection of images/information to identified purposes and locations.	Reduced	If the images were reduced to the identified purposes and locations the collection of images/information would be justified, compliant and proportionate
Retention of images/information	Images are only kept for 31 days after which it is automatically deleted.	Reduced	Retention periods are justified, compliant and proportionate
Lack of policies and procedures and mechanisms	Policy for the handling, storage and disclosure of images.	Eliminated	Policy exists. This is now justified, compliant and proportionate
Lack of signage	Each camera has CCTV signage, or there is signage at the entrance to the area covered by CCTV. Audited 2015.	Reduced	Signage exists. This is justified, compliant and proportionate
Images released to incorrect or appropriate persons	Policy for the handling, storage and disclosure of images.	Eliminated	Policy exists. This is now justified, compliant and proportionate
Loss of Images	Policy for the handling, storage and disclosure of images.		Policy exists. This is now justified, compliant and proportionate

Risk	Approved solution	Approved by