



**SURVEILLANCE CAMERA
COMMISSIONER**

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 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.

A privacy impact assessment (PIA) enables operators to unpick risks to compliance with the Data Protection Act 1988 and the Human Rights Act 1998. The PIA should initially consider the pressing need that the system seeks to address and the impact that recording may have on individual's privacy. It is important to decide whether the proposed system can be justified as proportionate to the reason it is needed.

In undertaking a privacy impact assessment you must take into consideration your obligations under the Data Protection Act 1998 and follow the guidance provided in the Information Commissioner's Office's (ICO) **CCTV code of practice**.

This privacy impact assessment template is specifically for those organisations that must have regard to the surveillance camera code of practice under the Protection of Freedoms Act 2012. It also helps organisations to address their data protection and human rights obligations.

A PIA does not always have to be conducted as a completely separate exercise and it can be incorporated into project planning or other management and review activities.

In deciding whether to conduct a PIA and its scope, consideration must be given to the nature and scope of the surveillance camera activities and their potential to impact on the privacy rights of individuals.

A PIA should be considered when you are reviewing your surveillance camera systems and when you are considering introducing new technology connected to them.

A privacy impact assessment should be considered when any of the following apply:

- 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 number plate recognition (ANPR), 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. It is recommended that you review your system annually (see ICO CCTV Code of Practice and Surveillance Camera Code of Practice Principle 10).
- If you are considering the capture of an additional identifier such as vehicle registration mark to enable ANPR.
- The activity or change will engage heightened privacy concerns such as voice recording and biometric recognition such as facial and gait recognition.
- 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.

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 the surveillance camera system 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 surveillance cameras is not appropriate.

Otherwise please proceed to complete the template below.

PRIVACY IMPACT ASSESSMENT TEMPLATE

The privacy impact assessment template comprises two parts.

Level one considers the general details of the surveillance camera system and supporting business processes, level two considers the specific implications for the installation and use of cameras

Template – Level One

Location of surveillance camera system being assessed:

Hartlepool Public Space CCTV system

Date of assessment 26.04.19

Review date 26.04.20

Name of person responsible Nicholas Stone

Data Protection Act 1998 and Surveillance Camera Code of Practice 2013

1. What is the organisation’s purpose for using the surveillance camera system and what are the issues that the system aims to address? Evidence should be provided which should include 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.

- (a) Prevention and Detection of Crime and Disorder
- (b) Apprehension and Prosecution of Offenders
- (c) Protection and Safeguarding of Vulnerable Persons and Victims
- (d) Protection of National Security
- (e) Protection of Public Safety
- (f) Protection of Public Health or Morals
- (g) Public Reassurance
- (h) The Protection of the Rights and Freedoms of Others
- (i) Protection of Hartlepool Borough Council assets and personnel
- (j) Management of public space areas and events
- (k) 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)
- (l) Assisting in Traffic Management and in Highway and Environmental Enforcement
- (m) Providing assistance with civil claims
- (n) Providing assistance and reassurance to the public in emergency situations
- (o) Providing assistance to Emergency Services and Emergency Planning in the management of emergency incidents

2. Can a surveillance camera technology realistically deliver these benefits? State why the use of surveillance cameras will deliver these benefits in practice including evidence to justify why that would be likely to be the case.

The use of CCTV:

- Allows for the monitoring of public areas at risk of crime and disorder on a 24/7 basis.
- Allows the collection of independent evidence for use in civil and criminal matters.

- Assists Hartlepool Borough Council, Cleveland Police, and other Statutory and Enforcement Agencies in carrying out their statutory, and regulatory, investigatory and enforcement duties.
- Assists and enhances the work of the Emergency Services and Emergency Planning in a more effective operational management of incidents.

3. What are the views of those who will be under surveillance? Please outline the main comments from the public resulting from your consultation – some consultation should be undertaken in the area being considered for a surveillance camera scheme. This can often be achieved by existing local consultation mechanisms such as local area committees, police beat meetings; but, if necessary depending on the privacy intrusion of the surveillance in question, other mechanisms could be considered such as face to face interviews, questionnaires being sent to residents/businesses and addressing focus groups, crime & disorder partnerships and community forums.

Hartlepool Borough Council's Public Space CCTV has wide public support from local residents and elected members.

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. Have other less privacy-intrusive solutions such as improved lighting been considered? There is a need to consider other options prior to the use of cameras. For example, could improved lighting deliver the same benefit? Does the camera operation need to be 24/7? Where these types of restrictions have been considered, provide reasons for not adopting them and opting to use surveillance cameras as specified.

Yes. CCTV cameras are not installed by Hartlepool Borough Council unless other actions have first been either considered, or attempted over a period of time to resolve or reduce the problem. What actions are taken will depend on the location, the circumstances of the issue(s), the risk of harm, and the vulnerability and the wishes of victims. Action considered may potentially include; improved lighting, extra police patrols, extra youth outreach patrols, extra security officer patrols, crime prevention and target hardening measures, encouraging public reporting of problems, restorative interventions, and the diversion, support, treatment, and education of perpetrators, along with enforcement actions.

5. 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.

- Crime prevention
- Reduction in crime and disorder
- Reduction in substance misuse
- Decreased costs to Public Services
- Increased guilty pleas of offenders
- Increased safeguarding of victims, vulnerable persons and vulnerable localities from harm
- Decreased fear of crime by local residents
- Increased confidence in public services
- Improved reputation of Hartlepool Borough
- Improved management of emergency incidents by Emergency Services and Emergency Planning

6. What are the privacy issues arising from this surveillance camera system? State the main privacy issues relating to this particular system. For example, the extent of information recorded, whether it will be only on those who are suspects or include those who are not, concerns arising from its use, retention and disclosure, likely expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective.

The CCTV system records 24 hours a day and retains images for 31 days from the Council's network of Public Space CCTV cameras. Images will consist of persons in public places using none covert CCTV cameras. This will include members of the general public and targeted individuals and their activities. The public are advised of CCTV cameras by appropriate signage.

The potential privacy issues are:

- (a) The collection, handling and retention of personal data
- (b) The collection, handling and retention of sensitive personal data
- (c) Risk of excessive, inappropriate or illegal viewing or monitoring or data release
- (d) Risk of accidental data loss

7. Have any privacy by design features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements? State the privacy enhancing technical 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 zones installed on cameras that overlook residential properties, etc? If these have not been adopted, provide a reason.

To ensure the security and control of data the CCTV system has the following safeguards:

- (a) The CCTV Centre is a restricted access and secure facility which is not open to the public.
- (b) No unauthorised audio or video viewing, transmitting or recording equipment is permitted in the Control Room or Viewing Suite. Warning signs reinforce this message.
- (c) The Control Room and Viewing Suites are physically designed to prevent unauthorised persons accessing, seeing, overhearing or accessing centre operations, systems or data.
- (d) CCTV operators have received training on:
 - Data Protection and Human Rights
 - Use and release of CCTV footage
 - Use of Radio Communications
 - Access Control
 - CCTV surveillance
- (e) The release of all images to Agencies is subject to approval by a CCTV operator and the completion of a CCTV Images Disclosure Form.
- (f) The release of all images to the Public is subject to approval by the Council's Data Protection Officer.
- (g) CCTV operators are Council employees subject to Contract of Employment, Corporate Code of Conduct, Data Protection and Information Governance Policies.
- (h) CCTV operators have signed a Confidentiality Agreement.
- (i) CCTV operators have been subject to Enhanced Disclosure and Barring (DBS) checks, and have cleared None Police Personnel Vetting Level 2 through Cleveland Police.
- (j) All electronic documents are stored in a secure I.T folder on the Council's servers.
- (k) All paper documents are stored in the secure CCTV Control Room.
- (l) All staff have a secure e-mail account and have received training regarding its use.

(m) All staff have been provided with training on the use, storage, disclosure and disposal of all confidential documents.

(n) All paper documents are disposed of by staff by shredding using an onsite High Security Micro Shredder. (DIN Level 4)

(o) All centre physical I.T assets and data bearing media are disposed of in accordance with ISO 27001:2013 through the Council's secure disposal processes.

(p) The CCTV Control Room, Viewing Suite and CCTV server room are subject to internal CCTV cameras which record on a 24/7 basis for audit and security purposes. Staff have no ability to stop, alter or delete this CCTV recording.

(q) All Radio communications are by secure Radio links.

(r) All Police Airwave Radio communications are recorded by Cleveland Police.

(s) Images are transmitted via the Council's own secure internal optical fibre network, a secure Virtual Private Network (VPN) on the Council's I.T network, or by Council owned secure wireless radio links.

(t) The CCTV Control Matrix and associated recording servers are stored in a secure server room onsite at the CCTV Centre. Access is restricted to the Centre Manager and authorised Council staff and contractors.

(u) All CCTV servers automatically delete images after 31 days after which no images are retained by the Council.

(v) The CCTV Control system and its associated recording servers are password protected and have built in audit programs to track all activity undertaken.

The CCTV system does not make use of any privacy zones. The measures listed above remove the need for them.

8. What organisations will be using the CCTV images and where is data controller responsibility under the Data Protection Act 1998? 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). Specify any data sharing agreements you have with these organisations.

The Council's Data Protection Officer is responsible for all data held by the Council.

In addition the CCTV Centre Manager and CCTV operators are also responsible for the security of any data held by the CCTV Centre.

The following persons/organisations may obtain/use images held by the Council:

- (a) Data Subjects - personal use
- (b) Cleveland Police - investigation of complaints
- (c) Crown Prosecution Service - prosecution of criminal suspects
- (d) Courts Service (i.e. County, Magistrates, Crown) - hearing of civil and criminal cases
- (e) Any Statutory or Enforcement Organisation carrying out their statutory, or investigatory, regulatory, licensing, or enforcement duties, (including the administration of their personnel)
- (f) Insurance Companies - on behalf of clients involved in civil and criminal cases
- (g) Solicitors Chambers - on behalf of clients involved in civil and criminal cases

An information sharing agreement exists between members of the Safer Hartlepool Partnership.

9. Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals? Explain why images that can 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 able to record images of identifiable individuals, whereas cameras justified on the basis of dealing with problems reflected in documents showing the current crime hotspots may need to capture images of identifiable individuals.

Yes. The CCTV system and all of its CCTV cameras are designed to be able to meet 5 levels of the CAST Standard:

- Monitor and Control
- Detect
- Observe
- Recognise
- Identify

The majority of the Council's cameras are moveable (PTZ) - pan, tilt, zoom cameras which have the ability to zoom in from a distance and can be used to obtain the identity of an individual as required.

The CCTV system records images in either high quality or HD depending on the camera involved.

All cameras have the potential to be used for all purposes previously set out in question 1.

10. Will the surveillance camera equipment being installed and the system of work being adopted be sustainable? Is there sufficient funding for the scheme? Consideration should be given as to how the revenue costs (e.g. monitoring, transmission) are going to be met, to ensure that the system remains effective and justified over its projected lifespan. State how long funding has been secured for.

The CCTV system has an ongoing sustainable revenue budget through mainstream Council funding. This is supplemented by a small income from the provision of out of hours services to internal and external clients.

Any new CCTV cameras added to the CCTV system must have an associated revenue budget approved before they are installed.

11. Will the particular system/equipment being considered deliver the desired benefit now and in the future? State how the system will continue to meet current and future needs, including your review policy and how you will ensure that your system is up to date. It is recommended that you conduct a minimum of an annual review of your system in order to consider whether it is still appropriate and able to meet the specified need it was set up to deliver.

Since 2017 the Council has replaced and upgraded its Town Centre and Night Time Economy area CCTV cameras with HD cameras, and also built a new CCTV Control Centre. This included the replacement of all CCTV Centre control and recording equipment.

All new CCTV equipment procured is designed for future compatibility under the ONVIF scheme standard.

The CCTV service has a mainstream revenue maintenance budget for the repair of CCTV equipment.

An annual review is carried out of the CCTV Service and its cameras. This consists of a review of the performance of the service and its cameras. Where any CCTV camera is shown to no longer be necessary it is decommissioned. Due to this in 2013 the Council decommissioned 12 CCTV cameras from its CCTV system.

12. 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 scheme will be used for any other purpose (e.g. traffic monitoring, enforcement, ANPR) in future and how such possibilities will be addressed. Will the cameras have a future dual function?

Not applicable. All cameras already have the potential to be used for all purposes as previously set out in question 1.

Human Rights Act 1998

Section 6(1) of the Human Rights Act 1998 (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. Therefore in addition to the above, if you are a public authority, you must make sure that your system complies with the requirements under the HRA.

1. Is the system established on a proper legal basis and is it operated in accordance with the law? State the statutory or other powers which provides the basis for the activity.

The CCTV system was established by Hartlepool Borough Council under:

(a) Section 17 of the Crime and Disorder Act 1998. This makes it the duty of an Authority to exercise its various functions with due regard to the likely effect of the exercise of those functions on; crime and disorder in its area and; the misuse of drugs, alcohol and other substances; and re-offending in its area.

(b) Section 163 of the Criminal Justice and Public Order Act 1994. This enables a local authority to promote the prevention of crime or the welfare of the victims of crime by providing apparatus for recording visual images of events occurring on any land in their area.

The use of CCTV is designed to assist the Council in tackling these issues and the CCTV system operates within the relevant legislation and Codes of Practice.

2. Is the system necessary to address a pressing need, such as public safety, crime prevention or national security? Articulate the problem and why this is a pressing concern.

Yes. The CCTV system is necessary for Public Safety, Crime Prevention and National Security purposes.

Hartlepool Borough is the smallest unitary authority in the North East England region and the third smallest in the country and includes some of the most disadvantaged areas in England.

Due to this Hartlepool Borough experiences higher than average rates of crime, anti-social behaviour and substance misuse.

Hartlepool Borough also includes the Port of Hartlepool, Hartlepool Nuclear Power Station, and Middleton Grange Shopping Centre.

The Council has invested in the use of monitored Public Space CCTV to assist in meeting its statutory requirements to reduce crime, disorder, substance misuse, reduce re-offending, protect public buildings and areas, improve public safety and confidence, and to assist the Emergency Services and Emergency Planning in identifying and managing emergency incidents.

3. Is it justified in the circumstances? Provide the justification.

Yes. Hartlepool's Public Space CCTV system provides significant operational and evidential benefit to the Council, Emergency Services, Retail Premises, Licensed Premises, and to the public.

4. Is it proportionate to the problem that it is designed to deal with? Explain why the level of privacy interference is proportionate to the overall privacy impact.

Yes. The Public Space CCTV system enables 24/7 monitoring of areas at risk of crime and disorder.

The CCTV system assists, supports and complements the work of the Council, Emergency Services, and the members of the Safer Hartlepool Partnership in reducing crime, disorder, substance misuse, and re-offending, and in protecting public buildings and areas, and improving public safety and confidence.

The CCTV system is operated within the relevant legislation and Codes of Practice.

5. Do any of these measures discriminate against any particular sections of the community?

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.

No. The CCTV system is located around Hartlepool in vulnerable localities and areas which are historically subject to, or at risk of persistent and often higher than average levels of crime and disorder. The CCTV system is operated within the relevant legislation and Codes of Practice.

All CCTV operators have received specialist accredited training regarding their role, responsibilities and legal duties, and are licensed by the Security Industry Authority for working as CCTV operators.

PRIVACY IMPACT ASSESSMENT LEVEL TWO

The Level 2 privacy impact assessment template is designed to give organisations a simple and easy to use document to record various placements and devices on their surveillance camera system and to demonstrate the recognition and reduction of 'risk' to privacy impact across their network or system.

This document seeks to satisfy the privacy impact assessment in principle two of the Surveillance Camera Code of Practice.

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 and/or the Data Protection Act.

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 privacy impact assessment should help identify those cameras (irrespective of the type) that may be directed at a more vulnerable area (e.g. a children's play area) and therefore presenting a higher privacy risk. This approach allows the organisation to document a generic approach to the 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.

An example of a risk assessment guide is shown in Appendix One

When undertaking a privacy impact assessment, it is important to be able to confirm where the organisation's cameras are sited. The system asset it is considered to be good practice for all organisations to maintain an asset register for all of their devices. This allows the system owner to record each site and equipment installed therein categorised in a manner to lead into the level two process.

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

Overall step one and step two will cover the uses of devices of the system. However, it may not be practicable to publically list or categorise each individual asset.

A register can be developed to capture the information required.

Template – Level Two

Step 1 (definition of 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 the cameras ability due to upgrade.

Please see example below:

ID	Camera types	Makes and models used	Amount	Description	Justification and expected use
1.	Standard Static	Confidential	-	Static images, no movement or zoom function. Standard definition images.	Public Space CCTV monitoring by CCTV Control Room 24/7 hrs
2.	Standard PTZ	Confidential	-	Pan, tilt and zoom function. Standard definition images.	Public Space CCTV monitoring by CCTV Control Room 24/7 hrs
3.	High-zoom PTZ	Confidential	-	Pan, tilt and zoom function. High Definition images.	Public Space CCTV monitoring by CCTV Control Room 24/7 hrs
4.	HD static	Confidential	-	Static images, no movement or zoom function. High definition images.	Public Space CCTV monitoring by CCTV Control Room 24/7 hrs
5.	HD PTZ	Confidential	-	Pan, tilt and zoom function. High Definition images.	Public Space CCTV monitoring by CCTV Control Room 24/7 hrs
6.	Covert	Confidential	-	Mobile deployable cameras.	Public Space CCTV monitoring.
7.	ANPR Cameras	0	0	n/a	n/a
8.					
9.					
10.					
11.					
12.					

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	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
A.	Town centre	Confidential	16	24 hrs for 31 days	24 hrs	The location historically experiences persistent higher than average levels of crime and

CAT	Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
						disorder which continue despite action by agencies. The privacy level expectation in a Town Centre is very low. The public is made aware of the Council's use of cameras by appropriate signage.
B.	Shopping Parades	Confidential	16	24 hrs for 31 days	24 hrs	The location historically experiences persistent higher than average levels of crime and disorder which continue despite action by agencies. The privacy level expectation at a Shopping Parade is very low. The public is made aware of the Council's use of cameras by appropriate signage.
C.	Industrial Estates	Confidential	17	24 hrs for 31 days	24 hrs	The location historically experiences persistent higher than average levels of crime and disorder which continue despite action by agencies. The privacy level expectation on an Industrial Estate is very low. The public is made aware of the Council's use of cameras by appropriate signage.
D.	Car Parks	Confidential	7	24 hrs for 31 days	24 hrs	The location historically experiences persistent higher than average levels of crime and disorder which continue despite action by agencies. The privacy level expectation in a public Car Park is very low. The public is made aware of the Council's use of cameras by appropriate signage.
E.	Open Space	Confidential	6	24 hrs for 31 days	24 hrs	The location historically experiences persistent higher than average levels of crime and disorder which continue

CAT	Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
						despite action by agencies. The privacy level expectation in a play area is high. The public is made aware of the Council's use of cameras by appropriate signage. CCTV operators are subject to extensive training and oversight as detailed in question 7 on page 6.
F.	Residential Street	Confidential	11	24 hrs for 31 days	24 hrs	The location historically experiences persistent higher than average levels of crime and disorder which continue despite action by agencies. The privacy level expectation in a residential area is high/very high. The public is made aware of the Council's use of cameras by appropriate signage. CCTV operators are subject to extensive training and oversight as detailed in question 7 on page 6.
G.	Council Building	Confidential	43	24 hrs for 31 days	24 hrs	The location historically experiences persistent higher than average levels of crime and disorder which continue despite action by agencies. The privacy level expectation in a public area very low. The public is made aware of the Council's use of cameras by appropriate signage.
H.						
I.						
J.						
K.						
L.						

Step 3 (Cameras where additional mitigation required)

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

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

Overall step one and step two will cover the uses of devices of the system. However, it may not be practicable to publically list or categorise each individual asset.

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

Camera number	Reviewed	Camera type	Location category	Further mitigation/ comments (optional)
N/A	N/A	N/A	N/A	N/A.

Step 4 (Mitigation for specific cameras that have high privacy risks)

For the occasion where there is a very high impact an Authority may wish to conduct an extensive PIA of specific installations and the site and have it fully documented.

PIA for specific installations

Camera number

Camera location

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?)
N/A	N/A	N/A	N/A

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?)

Agreed with:

N/A

Signature

N/A

Date

N/A

Review date

N/A

APPENDIX ONE: PRIVACY RISK ASSESSMENT MATRIX

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

Matrix Example:

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

APPENDIX TWO: STEPS INVOLVED IN CONDUCTING A PRIVACY IMPACT ASSESSMENT

