



**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: Jameson Road Public Space Surveillance CCTV System

Data controller(s): Wyre Council

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 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 project is intended primarily to influence behaviour by deterring would be fly tippers but also to assist with the successful prosecution of perpetrators where such anti-social behaviour continues to persist.

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)?

This project is to be an addition to the already existing town centre CCTV system.

A meeting of key stakeholders was held in December 2022 to define the scope of the project and agree to partnership working. The original project completion date was the 31st of March 2024 to comply with the grant funding terms and conditions however, this has now been extended due to unforeseen delays, with the funds slipped into the 2024-25 financial year with the agreement of the funding body.

This addition to the existing town centre CCTV network will be maintained in accordance with the SCC code of practice and governing guidance.

GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller.

Section 163 of the Criminal Justice and Public Order Act 1994 creates the power for local authorities to provide closed circuit television coverage of any land within their area for the purposes of crime prevention or victim welfare.

Wyre Council also consider it a necessary initiative towards their duty under section 7 of the Crime and Disorder Act 1998.

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/>

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.

CCTV cameras are to be installed on Jameson Road, Fleetwood as an addition to the town centres public space CCTV system.

Fly tipping has been occurring along Jameson Road for many years and has been the subject of historical complaints and attempted interventions. Whilst the majority of deposits tend to occur on private land, the local authority tries to provide assistance by way of enforcement intervention to deter future perpetrators. Many of the offences to date have however been 'sterile' with no evidence, no line of enquiry and no witnesses, making enforcement action impossible.

Much of the material tipped is household waste in nature (black bag, green, DIY, bulky items and WEEE), in addition to commercial and hazardous materials including tyres and asbestos. Such items are routinely dumped along the roadside, requiring clean-up and specialist removal. Wyre Council have received 23 reported incidents of fly tipping in this area within the last 12 months.

The negative effects of fly tipping have impacts for the surrounding landowners, the environment, and the wider community. These include the financial costs of clean up and impact on resources; the deterioration of the local amenity; reducing opportunities to enjoy green space; harm to the environment from oil, paint, chemical and plastic pollution; damage to the 'sense of place' i.e. areas that are unkempt are often valued less and are more inclined to be abused, with increased levels of anti-social behaviour, frustration and declining mental health. There are also health and safety concerns, with drug paraphernalia and needles present, and frequent fires requiring assistance from emergency services. Waste is also often tipped in the middle of the road causing an obstacle / blockage, or on the bend, out of sight and causing a hazard to drivers, particularly after dark.

This project is aimed at changing behaviours to reduce instances of fly tipping along Jameson Road, Fleetwood and to encourage responsible waste management by using legal and responsible means to dispose of waste.

Potential perpetrators need to be made aware that we are watching them and will prosecute if they persist with such illegal behaviour. Prosecution is however considered a last resort, and therefore it is hoped that the installation of visible CCTV cameras, together with warning and informing signage prominently positioned along Jameson Road, will function as a significant deterrent. The installation of speakers to the CCTV columns is also hoped to alarm potential perpetrators by use of direct communication from CCTV operators, and via the transmission of pre-recorded warning messages.

Research has shown a link between deprivation and environmental crimes, including fly tipping, graffiti, and dog fouling. Fleetwood is the second most dangerous medium-sized town in Lancashire with a crime rate 49% higher than the Lancashire average; 3 of the 5 wards in Fleetwood fall into the 5% – 10% most deprived wards in England. The restoration of civic pride and activity in so-called left-behind areas (more prominent in the North) is one of the core objectives of the Government's levelling up agenda – tackling fly tipping could be a crucial step in achieving this. Studies show that individuals are more likely to dump waste in areas that are already unkempt and dirty as such locations are often undervalued and more prone to abuse and anti-social behaviour. As part of this project, partners will invest in enhancing the appearance of the area with planting and resurfacing to make it more visually attractive, encouraging community involvement in recreational opportunities to enjoy green space and bring about sustained behavioural change to significantly reduce the occurrence of fly tipping and other nuisance activities along Jameson Road.

The provision of CCTV along Jameson Road will also serve to reduce other forms of anti-social behaviour, including vandalism to private property and nuisance / off roading vehicles. The latter has been the subject of much complaint in relation to the land bounding Jameson Road in recent years with off roading vehicles reported as causing much nuisance and annoyance to the residents of a nearby caravan park. It is therefore hoped that the provision of CCTV will help deter this activity from continuing in future, not only reducing the adverse impact to local residents, but also helping to protect against damage to the surrounding countryside and wildlife.



Jameson Road
Flytipping.xlsx

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?

These additional cameras will primarily be used to influence behaviour by deterring would be fly tippers but also to assist with the successful prosecution of perpetrators where this anti-social behaviour continues to persist, however all vehicles (registrations) and pedestrians that pass through the areas covered by the cameras will be recorded.

The council routinely processes the data of persons in public spaces. The data collected and processed is in the form of recorded video footage (no audio provided). This footage will include images of children, vulnerable persons, people of minority ethnic groups and religious beliefs, etc, however this will not be known at the time of recording unless the cameras are being proactively used by an operator.

Any proactive monitoring of the public must be justified by the operator. A full audit trail will be maintained and inspected by the system manager on a regular basis.

Images of individuals will only be released to investigating authorities in accordance with the objectives listed in the Code of Practice. The system will be used in an overt manner and signage informing the public that CCTV is in operation will be displayed within its location.

The CCTV system does not discriminate in any way. The only analytical capability of the equipment which will be used, is the ability to detect movement / human presence, to allow for the capture of relevant footage when the system is unmanned.

The scheme will be recording 24/7 and all footage captured by the system will be retained for 31 rolling days in accordance with the Council's Code of Practice, unless the footage is needed for evidential purposes, in which case it will be kept for a period of 6 months, after that it will be disposed off.

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.

Wyre Council will be sharing data with: Data Subjects; Statutory Prosecuting Authorities; Clients and Authorised Investigators for the purposes of Crime Prevention and Law Enforcement.

The Data owner and data controller is Wyre Council.

Wyre Council has written auditable procedures to cover disclosure to law enforcement agencies, solicitors, insurance companies and subject access requests.

A copy of the Safer Lancashire Community Safety Information Sharing Protocol – June 2022 – is provided.



Safer Lancashire
Community Safety dat

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

- | | |
|--|---|
| <input checked="" type="checkbox"/> Fixed CCTV (networked) | <input type="checkbox"/> Body Worn Video |
| <input 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) | |

The section of road identified is approximately 700m with a blind bend mid-way. It is intended that 4 cameras will be provided in total, from two columns. This will comprise 1 x PTZ camera and 1 x static camera at each column. Each camera will have inbuilt infrared illumination up to 400m. No additional lighting is therefore proposed.

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.

All cameras will be wirelessly linked to an antenna situated on United Utilities, Waste Water Treatment Plant. From there the live images will be transmitted to the Council's CCTV Control Room based in Poulton via a Fibre Optic Broadband line, enabling the live imagery to be monitored and data to be recorded to recorded evidential quality.

Cameras will be recording 24/7 every day of the year, and data will be captured in video format. The cameras **will not** record audio data. Nor will there be any use for a watchlist. No intergrated surveillance technology will be used other than that capable of detecting movement / human presence. No automatic facial recognition will be used. If no-one is in attendance the cameras will be returned to their pre-sets where data will continue to be recorded.

The live monitoring will be completed by SIA trained, licensed (where applicable) and DBS CCTV operators from the Council's main CCTV Control Room. Authorised users have received relevant training in legislation, procedures and use of the system.

The retention period for all data collected is a rolling 31 days, after which there is an automatic deletion of the footage by the system. Retention of all data, data sharing, and daa security will be in line with Council policy and procedures.

Where CCTV footage is requested it will be downloaded onto a disc which is password protected, or on to an encrypted USB memory stick. Data may also be uploaded to the Police NICE system. When handing over data, a handover release form will be required to be signed by the recipient.

Footage may be retained in an evidence locker for more than 31 days e.g. major incident where a large amount of data has been retained for investigation, civil proceedings, and Subject Access Requests. The evidence locker is reviewed by the manager on a monthly basis. The principles of GDPR/DPA 2018 will be adhered to at all times.

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.

Live and recorded video images will be viewed on site at Wyre Council's CCTV Control Room.

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)

Police will have access data on site or via their NICE system.

Subject Access Requests; requests from Insurance Companies; and request from solicitors will be dealt with by using encrypted media and courier or recorded delivery.

On occasion Sharepoint may be used. Access codes will be provided separately from the media. All parties will be required to sign a disclosure form for any media.

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)

Released to council departments investigating ASB, Licensing, Insurance Claims and Fly Tipping incidents.

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
<p>Wyre Council Corinne Mason (Manager of Environmental Protection & CS) 01253 887207 ----- Kathy Winstanley (Head of Public Realm and Environmental Sustainability) 01253 887376 ----- Alan Fitzpatrick (Waste, Recycling and Environmental Enforcement Manager) 01253 887301 ----- John Bettle (Environment Enforcement Officer) 01253 887220 -----</p>	<p>E-mail, phone, meetings</p>	<p>Project aims to influence behaviour and deter fly tippers through the use of prominent cameras, signage, and associated communications - providing a clear message that fly tipping is not acceptable; CCTV images captured will also assist with the successful prosecution of perpetrators where anti-social behaviour persists.</p>	<p>Application submission deadline: Midday 31 January 2023 Decisions communicated: 10 March 2023 Determination award letter accepted: 24 March 2023 Grant fund paid by: 31 March 2023 Monitoring and evaluation report submitted by: 31 October 2023 Completion of project and grant expenditure – 31s March 2024.</p> <p>SEQUENCE OF EVENTS: December 2022: Notification of Fly-Tipping Intervention Grant (FTIG): Invitation to apply, Rural Payments Agency 20th December 2022: Wyre Council, internal discussions with key staff to identify suitable locations to propose as suitable project locations 6th January 2023: Meeting with key partners and landowners to discuss proposal for a collaborative partnership to address fly tipping along Jameson Road, Fleetwood 9th January 2023: Report back to Corporate Director Environment with proposal, seeking approval to progress with funding application with Jameson Road as the project location. 9th – 27th January 2023: Information gathering as part of the background work to compile funding bid application, to include analysis of Council complaints system; feedback from partners with regards to impact assessment and cost/resource implications for their organisation; site visit, connectivity survey and liaising with potential suppliers for recommended options and indicative prices to provide CCTV and supporting infrastructure along Jameson Road 30th – 31st January 2023: Preparation and submission of funding application</p>

			<p>March 2023 – notification of successful submission and award of £48,000 through the Fly-Tipping Intervention Grant scheme</p> <p>April 2023 – April 2024 – project delayed due to numerous challenges beyond our control (lack of electricity and street lighting along the road, connectivity issues, temporary closure of the road during the United Utilities sewerage works delays, flooding issues, procurement and planning challenges and the presence of multiple utility cables running below the road surface hampering the installation of CCTV and lighting columns). During this time, an options appraisal and onsite assessments were undertaken to determine the most feasible and cost-effective solution for the area to inform the completion of the DPIA.</p> <p>May 2024 – completion of final portfolio Holder report for consideration as follows:</p> <ul style="list-style-type: none"> • Report deadline 31 May • CMT 5 June • Management Board 12 June • Decision notice 20 June • Action 28 June if no call in <p>July 2024 (subject to approval): progress procurement of goods and services; press announcement and commencement of communication campaign; award of good and services to successful supplier; ordering of signage and any other equipment required as part of the project</p> <p>August 2024: ordering, supply and installation of CCTV equipment and associated infrastructure to meet project specification; installation of complementary signage and rollout phase of project</p> <p>September – December 2024: ongoing project delivery including information gathering for monitoring and evaluation of project; preparation of any potential prosecution files where</p>
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			<p>evidence of crime has been obtained through CCTV footage and witness statements</p> <p>January 2025: project closure meeting, preparation and submission of monitoring and evaluation report (march 2025)</p> <p>Ongoing: evaluation and monitoring to determine long term impacts of project and contribution to sustained behavioural change; report back to Council leadership with project outcomes and recommendations of next steps – scale up and expand to other areas; communicate scheme successes and lessons to other authorities as blueprint for delivering behavioural change with regards to reducing fly tipping.</p>
Susan Houton (Partnerships Officer-CCTV) 01253 887292			Site Assessment for C-1, (included signage locations), Scope Process, Service Level Agreement, Complete Passport to Compliance, PIA and liaison with all stakeholders.
<p>Lancashire County Council Tim Blythe (Countryside Services Manager) ----- Christopher Wicks (Household Waste Recycling Centre Manager)</p>	E-mail, phone, meetings		
<p>United Utilities Stephen Hadow (Production Manager, Fleetwood, and Blackpool Area)</p>	E-mail, phone, meetings		
<p>Farmer Parr's James Parr (Local Landowner and Farmer)</p>	E-mail, phone, meetings		

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.

GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller.
Local authorities establish their CCTV systems under the GDPR/DPA 2018 and Section 17 Crime and Disorder Act 1998 which places an obligation on local authorities and the police to work in partnership to develop and implement a strategy for tackling crime and disorder. Section 17 outlines how and why local services may impact on crime and disorder and indicates the reasonable actions that might be put in place to ensure a co-ordinated approach to crime reduction. Evidence shows the opportunity for crime and disorder may be reduced and the safety and reassurance of the public improve when there is adequate CCTV coverage and it is used with other interventions. Using CCTV remains a strategic financial and operational choice in exercising crime reduction partnership responsibilities between the police and other relevant supporters. In addition, Section 163 of the Criminal Justice and Public Order Act 1994 creates the power for local authorities to provide closed circuit television coverage of any land within their area for the purposes of crime prevention or victim welfare.

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.

Wyre Council website provides information on location of cameras, statistics in the form of an annual report, privacy notice and Code of Practice. [CCTV – Wyre Council](#)
Appropriate signage will be placed in and around the areas where surveillance is taking place.
Participation in events such as surveillance camera day inviting groups into the Control Room.

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?

The Council has ensured, through the design and commissioning of the surveillance camera system that its specific remit and objective is to change behaviours to reduce instances of fly tipping along Jameson Road, Fleetwood and to encourage responsible waste management by using legal and responsible means to dispose of waste. However, the presence of CCTV is not only a deterrent but can provide reassurance to the public, it also provides an effective means of detecting other types of crime and assists the police and the Council in identifying offenders.
Effectiveness of the system will be measured by monthly performance indicators along with information supplied by the police and other council departments. Effectiveness of the system along with compliance with the Protections of Freedoms Act 2012 and SC Code of Practice, GDPR/DPA.

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

Footage will be retained for a rolling 31 days and then it will be automatically deleted by the system unless stored in the evidence locker. This should give investigating authorities and Data Subjects sufficient time to request footage.

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)

Historical footage may be retained in an evidence locker for more than 31 days, e.g. major incident where a large amount of data has been retained for investigation, civil proceedings and subject access requests. The evidence locker is reviewed by the manager/authorised assistant on a monthly basis.

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?

The Control Room is secured by means of keypad control and is restricted to authorised persons only, each individual will record the time/name/reason they entered the secure area on a signing in sheet. All CCTV operators wear a lanyard with identity badge and can only gain access to the system by means of an individual user name and robust password. The system and operators are subject to regular audit checks. Password protected discs are collected by police officers on site or uploaded to their NICE system, data is released to third parties e.g. insurance companies by recorded delivery/courier and encryption codes which are given separately. No international transfers are made.

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.

The council's CCTV policies and procedures are fully compliant with the GDPR/DPA 2018 for general disclosure access requests and CCTV related subject access requests. Information on subject access can be found on Wyre Council website and all requests are initially dealt with by the Information Governance Team and then passed to the CCTV Manager.

Link to CCTV Request Form: [Right of access | Your rights | Wyre Council](#)

Complaints are dealt with through the councils complaints procedures: [Complaints procedure | Complaints procedure | Wyre Council](#)

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.

Other solutions are always considered including the use of additional council resources such as ASB officers, lighting changes, target hardening of areas and the use of private security before CCTV is used. Privacy zones can be considered and regular audits can help to mitigate any intrusion.

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)

Any operation to do with CCTV is audited, this includes the use of cameras, reviewing and downloading of images, access, storage and incidents recorded. Regular audits are carried out by the CCTV manager and the internal audit department.
The Council have written policies and procedures relating to CCTV in place e.g. Code of Practice & Operational Manual(s).

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
<p>Non Compliance of GDPR/DPA 2018. The GDPR/DPA sets out seven key principles which LA CCTV System owners must comply with whilst operating a Public Space Surveillance System:</p> <ul style="list-style-type: none"> • Lawfulness, fairness, and transparency • Purpose limitation • Data minimization • Accuracy • Storage limitation • Integrity and confidentiality (security) • Accountability <p>Non-compliance may result in prosecution, financial penalties, and severe damage to the reputation of the local authority</p>	<p>Remote, possible, or probable Possible</p>	<p>Minimal, significant, or severe Significant</p>	<p>Low, medium, or high Medium</p>
<p>Compliance with articles 6, 8 and 14 of the Human Rights Act. The Act applies to public authorities and other bodies, which may be public or private, when they are carrying out public functions.</p> <p>Article 6: the right to a fair trial Article 8: right to a private and family life Article 14: protection from discrimination</p> <p>A breach of any article may impeded on the subjects rights and result in the prosecution of the local authority resulting in financial penalties and severe damage to its reputation.</p>	<p>Possible</p>	<p>Significant</p>	<p>Medium</p>

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
<p>Compliance with SC Code of Practice and the Protection of Freedoms Act 2012.</p> <p>The code of practice is issued by the Secretary of State under Section 30 of the 2012 Protection of Freedoms Act. Relevant authorities (as defined by section 33 of the 2012 Act) in England and Wales must have regard to the code when exercising any functions to which the code relates.</p> <p>A Failure on the part of any person to act in accordance with any provision of the surveillance camera code does not of itself make that person liable to criminal or civic proceedings.</p> <p>The surveillance camera code is admissible in evidence in any such proceedings.</p> <p>(A court or tribunal may, in particular, take into account a failure by a relevant authority to have regard to the surveillance camera code in determining a question in any such proceedings. This is reflected in the Crown Prosecution Service Disclosure Manual.</p> <p>Reputational damage to a Local Authority. The court may take inference in an authorities non-compliance.</p>	Possible	Significant	Medium
<p>Security of Data.</p> <p>A Security Data breach may result in prosecution under GDPR/DPA 2018 and result in financial penalties and severe damage to the reputation of the local authority.</p>	Possible	Significant	Medium
<p>Unauthorised Disclosure - may result in prosecution under GDPR/DPA 2018 and subject to financial penalties and severe damage to the reputation of the local authority.</p>	Remote, possible, or probable Possible	Minimal, significant, or severe Significant	Low, medium, or high Medium
<p>Misuse of Data - may result in prosecution under GDPR/DPA 2018 and subject to financial penalties and severe damage to the reputation of the local authority.</p>	Possible	Significant	Medium

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 (Eliminated reduced accepted)	Residual risk (Low medium high)	Measure approved? (Yes/no)
Compliance with GDPR/DPA 2018. Management of the use and security of the system including monitoring, reviewing and downloading of footage. Regular audits carried out and SCC Certification to be achieved.	Reduced	Low	Yes
Compliance with articles 4, 6 and 14 of the Human Rights Act Management of the use and security of the system including monitoring, reviewing and downloading of footage. Regular audits carried out and SCC Certification achieved. Spot checks on proactive monitoring by staff.	Reduced	Low	Yes
Compliance with SC Code of Practice and the Protection of Freedoms Act Management of system. SCC Full certification.	Reduced	Low	Yes

Options to reduce or eliminate risk	Effect on risk (Eliminated reduced accepted)	Residual risk (Low medium high)	Measure approved? (Yes/no)
<p>Security of Data Management of the use and security of the system including monitoring, reviewing and downloading of footage. Regular audits carried out and SCC Certification achieved. Spot checks on proactive monitoring by staff, use of passwords and checks carried out by maintenance contractors for network security.</p>	Reduced	Low	Yes
<p>Unauthorised Disclosure Release of data is strictly controlled by the council. Information Sharing Agreement is in place with the Police. All parties who use data from the system are aware of their obligations under GDPR/DPA. Full audit trail for any release of data. CCTV staff trained in unauthorised disclosure and misuse of data.</p>	Reduced	Low	Yes
<p>Misuse of Data Release and use of data is strictly controlled by the council. All parties who use data from the system are aware of their obligations under GDPR/DPA. Full audit trail for any release of data. CCTV staff trained in unauthorised disclosure and misuse of data.</p>	Reduced	Low	Yes
<p>Financial Loss Compliance with GDPR/DPA, POFA, Code of Practice and operating procedures reduces the risk of unauthorised disclosure or the misuse of data. SCC Full certification achieved and regular audits are carried out by the system manager.</p>	Reduced	Low	Yes

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:		If your decision departs from individuals' views, you must explain your reasons.
Comments:		
This DPIA will be kept under review by:		The DPO should also review ongoing compliance with DPIA.

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 type	Monitoring	Assessment of use of equipment (mitigations or justifications)
CCTV cameras are to be installed on Jameson Road, Fleetwood as an addition to the town centre public space CCTV system.	HD, PTZ	4	24/7	Live monitoring will take place when CCTV unit is operational.	<p>The privacy level in an urban area is low. None Residential Area. Appropriate signage for CCTV will be installed, detailing purpose and contact information.</p> <p>Regular audit checks will be carried out on all cameras.</p> <p>All recording and evidence downloads are secure and will be managed by the CCTV manager/SPOC.</p>

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	4									
Types										
A (low impact)										
Z (high impact)										

NOTES