

# Surveillance Camera Technologies

## Privacy Impact Assessment (PIA)

## Full Assessment Template

**Version:** 1

**Date Issue:** February 2017

**Reference:** SCT-PIA-FT

**Team:** Warwickshire Legal Services

**Protective Marking:** Public

## Surveillance Camera Technologies – PIA Full Assessment Template

### Privacy Impact Assessment – Full Assessment

<b>Name of Operator</b> <i>(officer responsible for the system)</i>	Jayne Faulknall-Mills
<b>Position</b>	Customer Services Face to Face Manager: North
<b>Service Area</b>	Libraries
<b>Group</b> <i>(Communities, Fire and Rescue, People or Resources)</i>	Resources Group
<b>Location of system</b>	Bedworth Library UPRN: 1033
<b>Assessment Date</b>	13.02.2017
<b>Review Date</b>	13.02.2018

The following sections should be completed by the **Operator**:

<b>Description of the system</b>
<i>Include here roughly where the capturing devices are to be located, how they will work, where the main system is intended to be stored, what times the system will be active (e.g. 24hr or specific time periods), etc.</i>
Cameras are already installed at the above premise. The system is not linked nor is this externally monitored. CCTV System is a stand-alone system. 4x Static cameras on-site covering the main library floor area. The monitor and recording device is located behind a secure door. The system installed as a 30 day recording window and is in operation 24/7/365.

<b>Purposes of the system</b>
<i>Include here why a surveillance or monitoring system is needed, whether there is a pressing need, what it seeks to achieve, whether there is a proper legal basis for collecting this information, etc.</i>
CCTV has been identified here at this property for the purposes of preventing anti-social behaviour / aggressive behaviour / harassing behaviour towards staff whilst carrying out their duties. The CCTV has been introduced on-site in the event of an incident as a backup for evidence in relation to any incidents. Due to the location of the site and type of work i.e. members of public having entry to the building, it could and has previously become a target of crime so the system is also for the prevention and detection of crime.

<b>Other possible solutions</b>
<i>Include here what other options are available for achieving the same purposes</i>
Having a dedicated security presence on site at all times which loses that face to face interaction relaxed environment of a library or alternatively increasing the staff based on site which would not

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be financially viable for either option.

### Advantages of the system

*Include here what the advantages of the surveillance or monitoring system are over the other options listed above*

The CCTV is a much more low-key/low-cost security backup device than a static guard or additional staff. It will provide the site with back up should problems occur on site enabling a fast response to calm the situation to call for support, or as evidence post an incident to support Police in their investigations. Staff can continue to be based in their main office meaning they are more productive as they sit as a team and do not need to provide a security rota to the new site.

### Data and/or images to be captured

*Explain here what data and/or images will be captured. For example, in relation to CCTV/ANPR who will be included in any images e.g. members of the public, staff, etc.*

Members of staff and members of the public are captured on the CCTV System

#### Internal

Cameras are installed in public, non-private areas in the building. For example cameras are in the main library area, but are not in areas where meetings take place, such as meeting or assessment rooms or staff only areas

#### External

No external cameras present on-site and nothing to be proposed for external coverage.

### Personnel with access to the system

*List all personnel who will have authority to access the system as part of their duties and what level of access they will have.*

#### CCTV Operators

Operators will be responsible for complying with the Procedural Guidance and any other relevant documentation. Operators have a responsibility to respect the privacy of the individual, understand and comply with the objectives of the Procedural Guidance. Operators are required to be proficient in the control and the use of the CCTV camera equipment, recording and playback facilities, media procedures and maintenance of all logs. The information recorded must be accurate, adequate and relevant to the purpose of the scheme. They should bring to the attention of the Responsible Officer immediately any equipment defect that may occur. CCTV Operators Include:

- CCTV Service Engineer (Operator - External)
  - This system will be serviced by the installer, [Clear Sound Security](#)
- Trained Service Staff (Operator – Internal)

#### CCTV Responsible Officer

The Responsible Officer names above as Jayney Faulknall-Mills has an overall responsibility to ensure

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that at all times the CCTV System is operated in accordance with the Procedural Guidance and all procedural instructions relating to the CCTV System, and for bringing to the immediate attention of the Manager any matter affecting the operation of the CCTV System, including any breach or suspected breach of the Procedural Guidance, security of Data or confidentially.

The Responsible Officer should ensure that at all times Operators carry out their duties in an efficient and responsible manner, in accordance with the objectives of the scheme. This will include regular checks and audit trails to ensure that the documentation systems in place are working effectively.

These systems include:

- a) Viewing Log
- b) Incident Log
- c) Faults and maintenance log
- d) Audit logs

The CCTV Responsible Officer at the time of preparing this Privacy Impact Assessment will be:

- Jayney Faulknall-Mills; Customer Services Manager Face to Face: North

### CCTV Manager

The Manager should undertake regular reviews of any documented procedures to ensure that the provisions of the Procedural Guidance are being complied with. The Manager shall also ensure that on a day-to-day basis all equipment is working correctly and that Warwickshire County Council complies with the Procedural Guidance. Dealing with breaches of the codes and disciplinary measures shall, where appropriate, lie with the Manager.

The CCTV Manager at the time of preparing this Privacy Impact Assessment will be:

- Colin Jones, Facilities Support Manager – To manage the system

### When and how the images and/or data will be accessed

*For example, include the circumstances in which the images will be accessed, what images will be viewed, how those images will be used, how that access will be recorded for audit purposes, etc.*

The live images will only be visible via a screen in the staff office as and when the monitor is switched on (not-visible to the public). The System will be password protected. Images will only be viewed where it is deemed necessary for the purposes set out in this Privacy Impact Assessment and images will only be used in accordance relevant the Procedural Guidance and any other relevant documentation or policies

### Ways in which people are made aware of the system

*For example, include here details of any signage proposed, whether they are WCC approved signs, where they are to be located, etc.*

WCC approved signs to be located around the building on entrance to the building and also located

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once inside to building to ensure all individuals who may enter the library environment being staff or members of the public are aware their images are being captured on CCTV.

### External agencies with access to the system

*Include here details of any third party organisations who provide and/or maintain the system (or monitor the system), whether they have access to the system, what restrictions there are placed on them accessing it, etc.*

The system will be serviced by the installer, [Clear Sound Security](#) (CSS).  
CSS are NSI NACOSS Gold Approved Installers of CCTV, Access Control & Intruder Alarm Systems.  
They are a BS EN ISO 9001:2008 Quality Assured Company.

We have data processing contracts in place with an external agencies above and their staffs are trained in the safe handling of images.

The system will be password protected so that only authorised staff can access the system to view images.

Clear Sound Security will not be able to view the images remotely due to not having this option with this system with a broadband link.

### Security of the system

*Include details of what security measures will be in place to protect the images and/or data*

The system will have password protection with only authorised members of staff having access to this.

The CCTV system hard drive is installed in the restricted access room area behind a secure door.

### Retention of data

*Include details here of how long the images and/or data will be held on the system, how it will be deleted (automatically or manually), who will have responsibility for this, etc.*

The CCTV images will be deleted automatically by the system after 30 days and re-recorded over. After this any images of incidents captured outside of the 30 days will not be available for view.

The time the images will be saved on the DVR would depend on whether a Subject Access Request form has been completed or a Police Access Request form has been submitted. In this case, the CCTV Operator with approval from the CCTV Manager would view the footage and burn a copy of the incident in question. It is difficult to say exactly as this depends on a lot of factors i.e. light changes, quality of recording and images per second; however it would be up to a maximum of 30

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days.

### Impact on privacy

*Include here an assessment of the impact that this system will have on the privacy of individuals, how they will be affected, how the invasion of privacy will be minimised, etc.*

Individual not knowing their images are being recorded, however this impact is limited as WCC compliant signage will be put in place to avoid this occurring

Access to monitoring points by unauthorised persons leading to the unauthorised viewing of images, and a data protection breach. Monitoring is accessible by staff who have been given passwords to access monitoring. The CCTV System is kept behind a staff only door and then within a restricted room.

WCC approved signage to be displayed around the property and externally before entering the building.

### Previous assessments

*Include details of any previous privacy impact assessments that have been conducted or any other assessments*

None

### Other relevant information

## Head of Service Sign Off

The following section should be signed by the **Head of Service** as the information asset owner:

Signed	
Dated	16 <sup>th</sup> November 2017

Once complete, please refer this assessment to Legal Services.

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## Legal Review

The following sections should be completed by **Legal Services**:

Comment on Assessment
<p><i>Include here a view on whether the assessment causes any concerns from a legal point view e.g. whether the justifications are reasonable and proportionate for the system to be introduced, whether the proposed scheme is compliant with the Surveillance Camera Technologies Policy, etc.</i></p> <p>It is understood that the CCTV will not be externally monitored and will only be operated by trained internal staff. The cameras are placed within public places and there will be appropriate signs notifying members of the public about the presence of CCTV.</p> <p>The CCTV footage appears to have been adequately protected as the recording device is located behind a secure door. Further safeguards are in place to ensure that the recording device/CCTV footage is password protected.</p> <p>The assessment clearly reviews alternatives (such as employing security staff) and provides conclusions as to why these are not appropriate and why the CCTV is therefore proportionate.</p> <p>I consider that the use of CCTV is reasonable given the objectives and rationale for the scheme, including the prevention of anti-social behaviour/aggressive behaviour and the prevention/detection of crime, in the light of such historic incidents.</p> <p>It is understood from the assessment that the staff will access CCTV footage in particular limited circumstances.</p> <p>In summary, it is noted that an analysis of privacy impact has been carried out and steps have been taken to minimise the impact on privacy for individuals. The nature of the work undertaken at this building and incidents of crime in the past present a pressing need for the CCTV system to be in place to ensure staff/property safety, prevent and detect crime and prevent other anti-social/aggressive behaviour. The proposed scheme appears to be compliant with the Surveillance Camera Technologies Policy.</p>

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Name	Gary Dalton
Dated	28.02.2017

### Approval Decision

The following sections should be completed by the **Surveillance Camera Manager**:

<b>Conclusions</b>
<i>Include here an analysis of the content of this assessment, your conclusions in relation to whether the system should be put in place, whether there should be further restrictions placed on how the system is used, etc.</i>
Subject to the legal comments being addressed I approve this assessment.

Please ✓ the relevant box

<b>Approved</b>	✓
<b>Approved subject to further actions</b>	
	<b>Further actions required</b>
	<i>State any actions that are required as a result of this assessment</i>

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Rejected	

<b>Name</b>	Tricia Morrison, Head of Performance and Interim Head of ICT Services
<b>Dated</b>	10 March 2017

### Completion of Further Actions

When the above actions have been completed, the further actions must be signed as complete by the **Surveillance Camera Co-ordinator**

<b>Signed</b>	
<b>Dated</b>	