

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

Privacy Impact Assessment – Full Assessment

Name of Operator <i>(officer responsible for the system)</i>	Colin Jones
Position	Facility Support Manager
Service Area	Resources
Group <i>(Communities, Fire and Rescue, People or Resources)</i>	Resources
Location of system	Montague Rd

Assessment Date	05.2.18
Review Date	05.2.19

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

<p>Description of the system</p> <p><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></p> <p>Cameras have been installed externally to the Units on site each camera is affixed to the units to cover the site grounds</p> <p>The system is linked to a sensor system. When the alarm is in operation and someone crosses an infrared beam, the alarms sound and alerts.</p> <p>The system is stored in a secure office, plus there is a second external copy.</p>
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<p>Purposes of the system</p> <p><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></p> <p>it was identified that the site is a high risk area in terms of likelihood of further thefts/arson Problems include grounds maintenance thefts of equipment and damage. The CCTV has been introduced as a backup to staff to respond to incidents.</p> <p>The system is for the prevention and detection of crime. It is also provided for staff</p>
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security and safety.

Other possible solutions

Include here what other options are available for achieving the same purposes

Having 24 hrs 7 day week security presence on site at considerable cost to the authority, and due to the openness of the site, a requirement will be for several mobile guards.

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 all year round, it covers more areas and visible to the naked eye to occupiers and intruders

Data and/or images to be captured
<i>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.</i>
<p>Member of staff and couriers, members of the public will be captured. They may be captured when accessing our land to get to the rights of way path on the adjacent field.</p> <p>External</p> <p>Cameras are installed to protect the building perimeter. The cameras only overlook our own property and do not view into neighbouring properties . External signs are located around the building</p>

Personnel with access to the system
<i>List all personnel who will have authority to access the system as part of their duties and what level of access they will have.</i>
<p>CCTV Operators</p> <p>The Operator will be responsible for complying with the Procedural Guidance and adhere to relevant documentation. Will fully 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, all use must be logged as per the guidance They should bring to the attention of the Responsible Officer immediately any equipment defect that may occur.</p> <ul style="list-style-type: none">• Monitoring Station Staff (Operator - External)• CCTV Service Engineer (Operator - External)• This system will be serviced by the installer, Integra <p>CCTV Responsible Officer</p> <p>The Responsible Officer has a responsibility to ensure 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.</p> <p>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.</p>

These systems include:

- a) Viewing Log
 - b) Incident Log
 - c) Faults and maintenance log
 - d) Audit logs
- Colin Jones – Facilities Support Manager

The Surveillance Camera Manager

The Surveillance Camera Manager has overall responsibility for the CCTV system and that it operates in accordance with the Procedural Guidance and all procedural instructions relating to the CCTV System. The Surveillance Camera Manager will not generally be accessing or downloading the CCTV, but instead providing overall guidance and assistance on the scheme.

Surveillance Camera Coordinators' Responsibilities

The Surveillance Camera Coordinators support the Surveillance Camera Manager by ensuring that they and the Operators carry out their duties in an efficient and responsible manner, and in accordance with the purposes of the scheme. Responsibilities include authorising access to recorded images for third parties and ensuring technical and operational matters are resolved. Again, the Surveillance Camera Coordinators will not generally access or download from the CCTV, but will instead provide guidance on the operation of the scheme and assist with requests for access to images.

- Jones, Facilities Support Manager (Internal) – manager of 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 be visible via a screen in an office (not-visible to anyone else) the caretaker will monitor and respond to a situation safely and seek authorisation as per WCC guidelines if asked too.

In relation to CCTV images, if an alarm is set off (where the infrared beams activated when site is alarmed) this will then be logged and images will only be accessed to the extent that it needs to be control and manage any incident.

Images will only be shared once approved in line with CCC CCTV Guidelines, this is

either using a subject access request or Police request form being completed and correct guidelines followed.

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 as necessary to be identified by the CCTV supplier and confirmed by WCC as appropriate.

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, Integra. they are NSI NACOSS Gold Approved Installers of CCTV, Access Control & Intruder Alarm Systems. They are a BS EN ISO 9001:2008 Quality Assured Company. The system will be monitored. Operational 24 hours a day, 365 days a year and accredited to NSI Gold Cat II ARC BS 5979.

We have data processing contracts in place with both external agencies above and their staff are trained in their safe handling of images

A site visit has been undertaken by WCC to see/clarify their security arrangements are in place

External agencies only have access when authorised to do so, or during a safe system check to ensure cameras are working, this access is always logged as a test

of the system.

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.

The CCTV system hard drive is installed within a secure Office with a back up elsewhere.

The main door is secure.

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.

Impact on privacy
<i>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.</i>
Compliant signage will be put in place which informs all, they are being recorded.
Monitoring is accessible by certain staff who have been given passwords to access the CCTV system.
Cameras do not cover residential areas, as tested for security and suitability for our areas only, we use the provider to move cameras on our buildings to cover our areas only.
CCTV at Montague Rd is only viewed during an incident, test, or after an incident.

Previous assessments
<i>Include details of any previous privacy impact assessments that have been conducted or any other assessments</i>
n/a

Other relevant information
Some thefts and damage was the overriding factor to install CCTV.
The system has been identified as necessary to ensure the health and safety of staff on site and prevention of thefts.
The system has been identified as necessary for the prevention and detection of crime.

Head of Service Sign Off

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

Signed	Steve Smith
Dated	05.02.2018

Once complete, please refer this assessment to Legal Services.

Legal Review

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

Comment on Assessment
<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>It is understood that the CCTV in this matter has been placed on a number of units due to health and safety issues and also for the prevention/detection of crime. This is due to previous incidents that have occurred at the sites.</p> <p>The CCTV does record and stream live 24/7, but access is limited.</p> <p>The CCTV cameras are focussed on specific areas of the external part of the building to secure the grounds and property and are not focussed on private areas. In addition members of the public may only be recorded where they are accessing WCC land to get to a public right of way. Therefore, any images caught of members of the public will be limited.</p> <p>To limit any impact on privacy, CCTV signage will be placed in appropriate places notifying members of the public and others about the presence of CCTV.</p> <p>The CCTV devices appear to have been adequately protected as the recording device is password protected and stored in a locked room..</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 the prevention/detection of crime, in the light of such historic incidents, and for health and safety purposes.</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. Incidents of crime/vandalism/theft 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 protect health and safety. The proposed scheme appears to be compliant with the Surveillance Camera Technologies Policy.</p>

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Name	Gary Dalton
Dated	05.02.2018

Approval Decision

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

Conclusions
<p><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></p>

Please ✓ the relevant box

Approved	Tricia Morrison, SIRO - In accordance with Legal comments
Approved subject to further actions	
	Further actions required
	<i>State any actions that are required as a result of this assessment</i>

