



**SURVEILLANCE CAMERA  
COMMISSIONER**

**ico.**  
Information Commissioner's Office

# **Data protection impact assessments** template for carrying out a data protection impact assessment on surveillance camera systems



**Project name:** Barmouth Town Council CCTV

**Data controller(s):** Barmouth Town 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 DPIA<sup>1</sup>:**

- |   |   |
|---|---|
| <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)                   |

**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)?

Installation from mid 2023, full deployment March 2024. This is an expansion of an existing CCTV system. Information will be controlled under GDPR regulations.

**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.

The system will normally be used retrospectively to support the investigation of reported crime, or requests for information from official bodies pursuing private prosecution, e.g. solicitors, insurance companies, local authority enforcement officers.

In very rare occasions the system may be used to aid in emergency situations or missing person searches when requested by an official body e.g. Police, Coastguard, RNLI etc.

<sup>1</sup> <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/>

**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?

Personal data will not normally be processed. Facial recognition will not be used on the system. ANPR cameras will record numberplates, but data will only be accessed to identify the movements of a specific vehicle retrospectively. The system will not be used for pro-active tracking of vehicles.

**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.

Barmouth Town Council are the decision makers and will involve the Police in any decisions on use or process.  
Footage from the cameras may be shared with insurance companies, solicitors, Local Authority enforcement officers. No personal data will be added to the footage shared.

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

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

**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.

Data will be in the form of picture video footage, no audio data will be captured. The system will record video footage on to a recording device that stores up to 28 days of material. After that time the information will be overwritten.  
In the event of a request for footage from the Police or other authorised body, the data on the recording device will be searched for relevant footage relating to the specific incident. This will be copied from the recording device and stored in a secure location. The footage will be made available to a third party when they have agreed to the conditions of use:  
- Footage is only to be used for the purpose originally requested

- Footage is not to be shared further (if other parties need it they must apply to Barmouth Town Council for a copy)  
- Footage will be destroyed within 6 months of the conclusion of the incident.  
The system will not use automatic facial recognition.  
Data from the ANPR cameras will be handled in a similar manner.

#### 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.

Recording device is located in the central control room. It does not include audio recording.

#### 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)

Footage will be released to authorised parties by secure digital transfer.

**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)

## Consultation

### 11. Record the stakeholders and data subjects you have consulted about the deployment, together with the outcomes of your engagement.

<b>Stakeholder consulted</b>	<b>Consultation method</b>	<b>Views raised</b>	<b>Measures taken</b>
Police	Face-to-face	Need a fully working CCTV system, need higher quality images for prosecution, need ANPR to help track vehicle movements after a crime	Design of expanded system takes into account further needs of Police
Former CCTV volunteer group	Face-to-face	Need someone to take over the maintenance costs and expansion of the current system	Responsibility taken over by Barmouth Town Council
Local community groups	Face-to-face	Some areas of town are not covered by the existing system leaving them vulnerable to crime and anti-social behaviour.	Identified areas needing additional coverage

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## 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.

Prevention of crime and support for the investigation & prosecution of crime.

**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.

Signage in the areas covered by CCTV. Policies & documentation available on the Barmouth Town Council Website.

**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?

Data is only processed after an incident and in response to reported crime or request from approved body.

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

Video footage stored for 28 days. Any footage downloaded in support of a crime or request from approved body will be destroyed within 6 months of the closure of the incident.



## 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)

Standard retention period on central recording device is 28 days. Authorised operators may store a copy of the footage in a secure place. This shall be destroyed within 6 months of the closure of the case.

**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?

Recording device in central location is supplied with approved software from the installation company.

**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.

Requests for data will be made to an email address set up for the purpose, or to the Police. Data will not be provided to individuals, only to approved bodies such as the Police, Insurance companies, a solicitor or Enforcement officers from the local authority.

**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.

The need is for evidence to investigate & prosecute crime. Better lighting, or improved security can not be used to support a prosecution.

**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)

## 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
Mis-use of video footage from system. If the system is accessed by un-authorised personel, images could be shared unlawfully.	Remote, possible or probable Remote	Minimal, significant or severe Significant	Low, medium or high Low
Retention period not followed by 3 <sup>rd</sup> parties who footage is released to.	Possible	Minimal	Low
Misinformation spread by the public about the use of system leading to reputational damage to the Council	Possible	Minimal	Low

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

## 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.**

<b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk</b>			
<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved?</b>
Procedures in place to govern the access to and retention of footage from cameras	Eliminated reduced accepted Reduced	Low medium high Low	Yes/no Yes
Ensure all documentation regarding CCTV system is available to the public via the Town Council's website	Reduced	Low	Yes

Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
	Eliminated reduced accepted	Low medium high	Yes/no

## 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.

<b>Item</b>	<b>Name/date</b>	<b>Notes</b>
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:		

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This DPIA will be kept under review by:		The DPO should also review ongoing compliance with DPIA.
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## 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	Monitoring	Assessment of use of equipment (mitigations or justifications)
Town centre	Static	60	24hrs	None, only reviewed retro-spectively	The privacy level expectation in a town centre is very low; our town centres are well signed with appropriate signage for CCTV its use and purpose with contact details.
Entry & Exit points	ANPR	2	24hrs	None, only used retrospectively	ANPR cameras used to track vehicles identified as involved with crime.
Promenade	Static & high zoom, panning	3	24hrs	None, used retrospectively. Can be used in the event of emergency or missing person search	Not live monitored, same justification as Town Centre. However the capability of support in an emergency or missing person search justifies the pan & zoom capabilities.

## APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



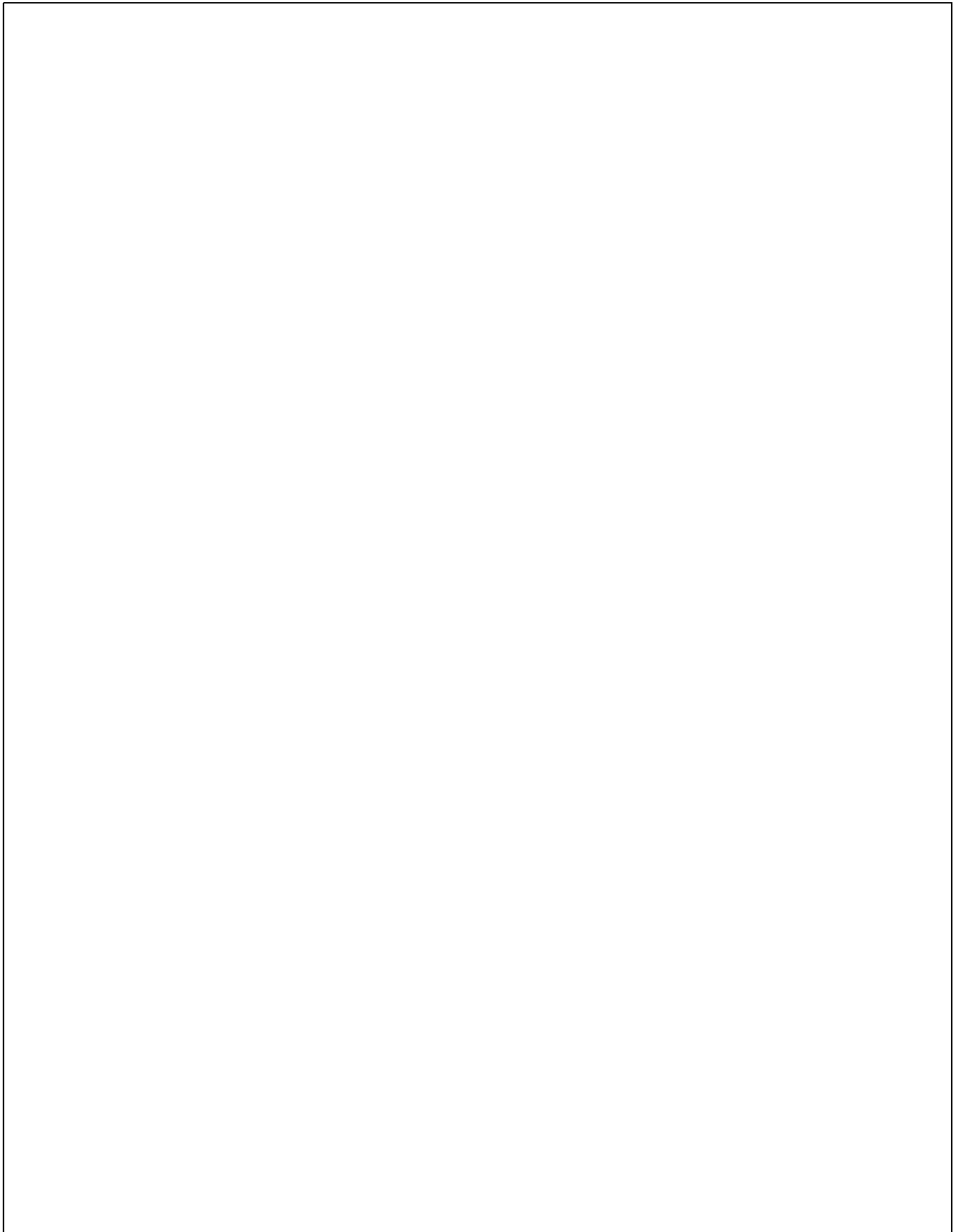
## APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

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										
Types										
A (low impact)										
Z (high impact)										

## NOTES

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