

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 enables operators to unpick risks to compliance with the Data Protection Act 1998/UK GDPR and the Human Rights Act. 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 needs.

In undertaking a Privacy Impact assessment you must take into consideration your obligations under the Data Protection Act 1998/ UK GDPR and follow the guidance provided in the ICO's [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 PoFA. 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 allied 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. ANPR, Body worn cameras, remotely operated 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 engage 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 VSS 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 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 camera surveillance 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 camera surveillance 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:

Enfield Public Safety Centre

Date of assessment: 09.08.2019

Review date: 05.012.2023

Video Surveillance System (VSS previously referred to as CCTV)

Name of person responsible: Darren Woods

Data Protection Act 1998 UK/GDPR and Biometric Surveillance Camera Code of Practice

1	What is the organisation's purpose for using the VSS and what are the issues that the system aims to address?	<p>Prevention and detection of crime and disorder and public safety. To also assist in the overall management of Enfield and other public areas within its client base</p> <p>To enhance the Community Safety in the borough and assist in the borough's enforcement and regulatory functions</p> <p>Assisting in traffic management and enforcement to support civil proceedings around schools</p> <p>Staff administration. And public assistance</p> <p>Crime and other performance statistics are published on the council website.</p>
2	Can VSS technology realistically deliver these benefits?	<p>Use of VSS does provide evidential and other data that can be used to detect and or provide independent evidence for criminal or civil matters.</p> <p>Proactive use by monitoring VSS enhances the work of the emergency services and others in a more effective operational management of incidents</p>
3	What are the views of those who will be under surveillance?	<p>Enfield's corporate system is highly effective and fully certificated by industry inspectorates. It enjoys local public support from members and residents.</p> <p>An independent inspection scheme in addition to the formal audits provides extra reassurance to the public.</p> <p>Future new camera requests will require local consultation to comply with the BSCC Code of Practice through an approval process using appropriate council ward members.</p>
4	Have other less privacy-intrusive solutions such as improved lighting been considered?	<p>The requirement for VSS is assessed through the use of a operational requirement process that will include consideration of other options.</p>
5	What are the benefits to be gained from using VSS ?	<p>Public VSS usage enhances council and emergency services to provide operational support and recorded evidence product.</p> <p>Proactive monitoring has proven to be highly effective in detection of incidents that are notified to the relevant services.</p>
6	What are the privacy issues arising from this surveillance camera system?	<p>Privacy issues are</p> <ol style="list-style-type: none"> 1.Overlooking private space 2.Recording of personal DATA 3.Retention and deletion of data 4.Excessive or inappropriate monitoring 5.Data handling and provision
7	What privacy design features will be adopted to reduce privacy intrusion?	<p>To ensure privacy of data the system has the following safeguards.</p> <ol style="list-style-type: none"> 1. Secure premises and restricted access 2. Automated digital data deletion process 3. Evidence handling procedures

		<ol style="list-style-type: none"> 4. Privacy masking on cameras 5. Regular privacy checks 6. Inspectorate certification and audit 7. System and network security processes 8. Can provide physical screens on locations 9. Staff training and supervision and processes
8	What organisations will be using the VSS images and who will take legal responsibility for the data under the Data Protection Act 1998?	<p>Data users are as notified in the Council's DPA registration that includes</p> <ol style="list-style-type: none"> 1. Data subjects 2. Statutory prosecuting authorities 3. Clients and authorised investigators <p>The system has SLAs reflecting these standards with all of its clients</p>
9	Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?	<p>The system records images in high quality and dependant on the type and location of individual cameras and the capabilities are able to provide images of individuals.</p> <p>Some fixed cameras are set to provide this level and others for general overview of the area of coverage.</p> <p>Moveable (PTZ) pan, tilt, zoom cameras have the ability to zoom in at great distance and are used proactively to gather identities of individuals as required.</p> <p>However their general primary pre-set position is usually set to an overview of camera coverage area to maximise observational monitoring and minimise personal Data capture.</p>
10	Will the VSS equipment being installed and the system of work being adopted be sustainable? Is there sufficient funding for the scheme?	<p>The corporate system has a sustainable revenue budget through income recharging of external services.</p> <p>The corporate system has a capital replacement budget and programme in place that is reviewed at least annually.</p> <p>Any new cameras to the system must have an associated revenue budget approved before they are installed.</p>
11	Will the particular system/equipment being considered deliver the desired benefit now and in the future?	<p>The corporate system has been designed for resilience and future compatibility in order to ensure that any part of the system may be replaced or upgraded with minimal impact and cost.</p> <p>The corporate system is continually being refreshed technically to ensure maximum effectiveness and take advantage of future technology. Including the environmental impact around equipment and disposal.</p>
12	What future demands may arise for wider use of Images and how will these be addressed?	<p>Currently some of the cameras on the system are dual purpose these can be used for traffic enforcement around Schools only and Community Safety for prevention detection of crime.</p> <p>ANPR cameras are currently in use and are linked into the police system for proactive monitoring.</p> <p>Developments in place for the provision of remote live images to authorised users and for remote data provision by secure means.</p> <p>Use of 4G cameras to ensure the Council can respond/deploy to highlighted areas crime hotspots.</p>

Human Rights Act 1998		
1	Is the system established on a proper legal basis and is it operated in accordance with the law?	The corporate system was established under sec 115 of the crime and disorder act. It operates within the legislation requirements and is fully accredited by the industry inspectorates to all required standards. SSAIB which is carried out annually and adheres to the Biometric camera surveillance code of practice.
2	Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?	<p>Enfield is a London borough and as a large urban area within the capital city has its proportion of crime and disorder.</p> <p>The council has invested in the use of public VSS and ANPR systems with proactive monitoring to assist its statutory requirements to reduce crime, disorder, enhance its ability to manage emergency incidents and improve public safety.</p> <p>The continued success of the corporate system is performance managed and externally accredited</p>
3	Is it justified in the circumstances?	Correct use of public Cctv has shown to be of considerable operational and evidential benefit to the authority and emergency services and is supported by the local residents and council members.
4	Is it proportional to the problem that it is designed to deal with?	<p>The corporate system and the way it operates is deemed proportional by its professional accreditations and its proven success.</p> <p>There are measures in place to protect personnel privacy that ensure that the system always operates with due regard to the public's right of privacy wherever possible</p>
5	Do any of these measures discriminate against any particular sections of the community?	The corporate system and its many management processes ensure that discrimination in all its forms are not breached and staff are fully trained in legislation requirements when operating the system.

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 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.

register can be developed to capture the information required.

Template - Level Two

Step 1 (definition of camera types utilised)

Enfield EPSC Camera type table					
ID	Camera Types	Makes and Models used	Amount as at 05/12/2023	description	Justification and expected use
1	Fixed Internal static	Indigo Vision, 360 vision Bosch Axis Ultra2K	544	Static images, no movement or zoom function	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs,for prevention and detection of crime and disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration
2	Fixed external static	Indigo Vision, Axis, Commend	180	Static images, Standard definition recording capture	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs,for prevention and detection of crime and disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration
3	Fixed External HD	Avigilon, Indigo Vision	38	Pan Tilt and Zoom capability, High Definition recording capture	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs,for prevention and detection of crime and disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration Digital zoom capability allows more detailed coverage of its scope of view only. This provides better high quality images to be recorded over standard definition types. Recorded

					24hrs,for prevention and detection of crime and disorder, public safety and site security
4	Internal PTZ	Indigo Vision, Axis	0	Pan Tilt and Zoom capability, standard definition recording capture	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs,for prevention and detection of crime and disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration Pan Tilt and Zoom capability remotely allows the camera to have several pre-set or other home positions or to be used on incident events monitoring.
5	Internal PTZ HD	Indigo Vision	0	Pan Tilt and Zoom capability, High Definition recording capture	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs,for prevention and detection of crime and disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration Pan Tilt and Zoom capability remotely allows the camera to have several pre-set or other home positions or to be used on incident events monitoring.
6	External PTZ	360 vision Ultra2K	385	Pan Tilt and Zoom capability, standard definition recording capture	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs,for prevention and detection of crime and disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration Pan Tilt and Zoom capability remotely allows the camera to have several pre-set or other home positions or to be used on incident events monitoring.
7	External PTZ HD	Predator, Ultra 2K 360 vison	74	Pan Tilt and Zoom capability, High	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs,for prevention and detection of crime and

				Definition recording capture	disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration Pan Tilt and Zoom capability remotely allows the camera to have several pre-set or other home positions or to be used on incident events monitoring.
8	External PTZ Redeployable	, Ultra 2K Indigo Currently 14 cameras in Operation 3 MICI radio cameras	14	Pan Tilt and Zoom capability, these cameras are High Definition recording capture but additionally are able to be deployed	Public space monitoring locally on site and/ or at EPSC Recorded 24hrs, for prevention and detection of crime and disorder, public safety, site security, enforcement and other listed permitted uses under DPA registration Pan Tilt and Zoom capability. Ability to deploy to other areas allows owners to maximise efficiency and target defined problem areas without the need to place permanent cameras
		TOTAL LBE CAMERAS – ALL TYPES	831		
		TOTAL NON – LBE CONNECTED CAMERAS	283		

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 and local high street shopping areas		400	24hrs	24hrs – regular camera patrols based upon risk and intelligence information	<p>The privacy level expectation in a town centre is very low, our town centres and high streets.</p> <p>These areas are well signed with appropriate signage for CCTV its use and purpose with contact details.</p> <p>However all recording and evidence downloads are locked down and only managed by EPSC staff/ police</p>
B	Public Car Parks		37	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	<p>The privacy level expectation in a public car park is very low.</p> <p>These areas are well signed with appropriate signage for CCTV its use and purpose with contact details.</p> <p>However all recording and evidence downloads are locked down and only managed by EPSC staff/ police</p>
C	Parks		41	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	<p>The privacy level expectation in a public park is low, These areas are well signed with appropriate signage for CCTV its use and purpose with contact details.</p>
D	Housing Blocks Internal		125	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	<p>Internal block cameras may be installed in stairways, lifts, communal foyers and covering entrance and exits to assist with ASB, crime and criminal damage as well as</p>

						asset management and building security. They are installed with leaseholder /tenant consent as are paid through HRA funding.
E	Residential Street		88	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	Cameras are installed on identified crime or ASB areas in estates in order to assist in crime detection and incident and estate management. They may also be installed as part of new estates overall security and safety measures in regeneration projects. Usually PTZ cameras but may include some fixed camera types for specific view point capture.
F	Retail, Leisure and industrial parks		27	24hrs	May have own monitoring and site security capability. 24 hrs – patrols every shift and as required based on intelligence or other information	These are patrolled every shift for site security, administration, public and property and staff safety purposes and can be viewed remotely at the EPSC control room and/or monitored locally by authorised staff/security.
G	Housing estate (street)		20	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	Cameras are installed on high crime or ASB area estates in order to assist in crime detection and incident and estate management. They may also be installed as part of new estates overall security and safety measures in regeneration projects. Usually PTZ cameras but may include some fixed camera types for specific view point capture. These areas are well signed with appropriate signage for CCTV its use and purpose with contact details.

						However all recording and evidence downloads are locked down and only managed by EPSC staff/ police
H	Sites and Depots		386	24hrs	May have own monitoring and site security capability. 24 hrs – patrols every shift and as required based on intelligence or other information	Cameras are installed in civic buildings , libraries , depots etc for site security, administration, public and property and staff safety purposes and can be viewed remotely at the EPSC control room and or monitored locally by authorised staff/security. These areas are well signed with appropriate signage for CCTV its use and purpose with contact details However all recording and evidence downloads are locked down and only managed by EPSC staff/ police
I	Play Areas		10	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	The privacy level expectation in a play area is medium as parents would have concerns over child safety and perhaps welcome cameras, but this is also weighed against images of children captured and how they are secured, used and destroyed. These areas are well signed with appropriate signage for CCTV its use and purpose with contact details. However all recording and evidence downloads are locked down and only managed by EPSC staff/ police
J	Schools and colleges		20	24hrs	May have own monitoring and site security capability. 24 hrs – patrols every shift	These are patrolled every shift for site security, administration, public and property and staff safety purposes and can be viewed remotely at

					and as required based on intelligence or other information	<p>the EPSC control room and/or monitored locally by authorised staff/security.</p> <p>Cameras are installed in buildings public areas or outside the building covering parking or access routes.</p> <p>These areas are well signed with appropriate signage for CCTV its use and purpose with contact details</p> <p>However all recording and evidence downloads are locked down and only managed by EPSC staff/ police</p>
K	NHS, Health sector sites		38	24hrs	May have own monitoring and site security capability. 24 hrs – patrols every shift and as required based on intelligence or other information	<p>These areas are well signed with appropriate signage for CCTV its use and purpose with contact details</p> <p>However all recording and evidence downloads are locked down and only managed by EPSC staff/ police</p>
L	Tower block rooftops or other high sites		7	24hrs	Recording 24hrs but default is zoomed out unless tasked to specific issue and or on incident operations	Cameras are placed on corporate high rise building or housing tower blocks in order to provide great strategic overviews of the borough that assist in ANPR and incident management for areas where general local CCTV is not available. However, due to greater privacy intrusion risk the cameras are set to default as zoomed out so as not to capture private space and only then utilised on incidents and or specified authorised tasking.

						<p>These areas are well signed with appropriate signage for CCTV its use and purpose with contact details</p> <p>However all recording and evidence downloads are locked down and only managed by EPSC staff/ police</p>
M	Body worn video cameras	Indigo BWV	4	Used by staff as required on duty	Recording is as and when unit is worn and activated	This device records locally and then is downloaded onto the EPSC LAN for recording and retention to the same 31 days as all other data processing of the system 2x docking station in operation 1x EPSC 1x Emergency Planning
		TOTAL NUMBER OF LBE CAMERAS	1203			

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. Any additional mitigation taken on a camera or system to ensure that privacy is in line with the ECHR requirements is documented alongside the individual camera details on the master camera list.

Agreed with Darren Woods – EPSC Manager

Signature.....

Date 05/12/2023

Review date 05/12/24

Appendix One – Privacy Risk Assessment Matrix

LB Enfield EPSC system Risk Matrix:

		Fixed internal static	Fixed external static	Fixed external HD	Internal PTZ	Internal PTZ HD	External PTZ	External PTZ HD	External Redeployable HD	ANPR	Body Worn Video cameras (used by MPS)
	Town Centre / high street	1A	2A	3A	4A	5A	6A	7A	8A	9A	10A
Location Types	Public car parks	1B	2B	3B	4B	5B	6B	7B	8B	9B	10B
	Parks	1C	2C	3C	4C	5C	6C	7C	8C	9C	10C
A (low impact)	Housing blocks – internal	1D	2D	3D	4D	5D	6D	7D	8D	9D	10D
Z (high impact)	Residential streets	1E	2E	3E	4E	5E	6E	7E	8E	9E	10E
	Retail leisure and industrial areas	1F	2F	3F	4F	5F	6F	7F	8F	9F	10F

	Housing estates (street)	1G	2G	3G	4G	5G	6G	7G	8G	9G	10G
	Sites and depots	1H	2H	3H	4H	5H	6H	7H	8H	9H	10H
	Play Area	1I	2I	3I	4I	5I	6I	7I	8I	9I	10I
	Schools and colleges	1J	2J	3J	4J	5J	6J	7J	8J	9J	10J
	NHS, health and places of worship areas	1K	2K	3K	4K	5K	6K	7K	8K	9K	10K
	Tower block high camera sites	1L	2L	3L	4L	5L	6L	7L	8L	9L	10L
	Body worn – all areas	1M	2M	3M	4M	5M	6M	7M	8M	9M	10M

Appendix Two: (Steps involved in conducting a privacy impact assessment)

