

Location of surveillance camera system being assessed:

West Suffolk Council CCTV Control Room

Date of assessment: 3.2.2019      Review date: 3.2.2020

Name of person responsible: Luke Porter

## Level 1

*Level 1 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*

Data Protection Act 1998 and Surveillance Camera Code of Practice		
1	What is the organisation's purpose for using the CCTV and what are the issues that the system aims to address?	<p>To assist in the prevention and detection of crime</p> <p>To assist in the promotion of community safety and to reduce anti-social behaviour.</p> <p>To assist the client (system owner) in providing any of its prosecuting or contracted services.</p> <p>To assist in the management of the town centre, this includes monitoring safety or operationally critical activities on a particular site.</p> <p>To assist the council in the protection of assets.</p>
2	Can CCTV technology realistically deliver these benefits?	CCTV since its implementation has prevented and deterred crime statistically and it has provided police and courts with the necessary evidence to prosecute anyone engaging in criminal activity.
3	What are the views of those who will be under surveillance?	<p>The CCTV surveillance is supported by the councils endeavour and promise to make the towns in which it covers more safe and profitable for its residents and local businesses by preventing and deterring criminal activity.</p> <p>Assurance is given to members of the public that all our operators are SIA approved and NPPV2 vetted by police and peoples rights are covered by the DPA/GDPR.</p> <p>Any future camera requests will require local consultation to comply with the SCC Code of Practice through an approval process ensuring that new installed cameras are installed for their intended purpose only.</p>
4	Have other less privacy-intrusive solutions such as improved lighting been considered?	Other less privacy-intrusive solutions are always considered before the implementation of a new camera. In some cases improved lighting and CCTV installation co-exist to make a particular area safer for residents.

5	What are the benefits to be gained from using CCTV?	<p>Public CCTV usage helps in the prevention and detection of crime which ultimately leads to criminal prosecution in regards to police/court investigations.</p> <p>Through its continued success a town can become a much safer environment for members of the public but additionally attract new businesses to the area allowing a town to economically thrive.</p> <p>Not only do the operators reactively respond to police airwaves when they have received an emergency call about an incident but our operators are also very proactive when monitoring CCTV and it has proven to be highly effective in detection of incidents.</p>
6	What are the privacy issues arising from this surveillance camera system?	<p>Privacy issues include the following</p> <ul style="list-style-type: none"> <li>Viewing of private space</li> <li>Recording of personal data</li> <li>Retention and deletion of footage</li> <li>Excessive or inappropriate monitoring</li> </ul>
7	What privacy design features will be adopted to reduce privacy intrusion?	<p>To ensure privacy the council has adopted the following features</p> <ul style="list-style-type: none"> <li>All cameras have the ability to have masking privacy windows to block operators from viewing inside people homes.</li> <li>All operators are SIA trained to understand the DPA/GDPR</li> <li>All recorded images are automatically deleted after 31 days</li> <li>Evidence handling procedures</li> <li>Management carry out random spot checks on operators camera work to ensure there is no excessive or inappropriate monitoring</li> <li>Management ensure that all operators are NPPV2 level vetted and training is completed</li> <li>System and network configurations are secure and managed by qualified and vetted engineers.</li> </ul>
8	What organisations will be using the CCTV images and who will take legal responsibility for the data under the Data Protection Act 1998?	<p>Data users include;</p> <ul style="list-style-type: none"> <li>Data subjects</li> <li>Statutory prosecuting authorities (Police)</li> <li>Clients and authorised investigators</li> </ul>

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 CCTV system records images at a high quality and dependant on the type and location of particular cameras and their capabilities will depend on whether images of individuals are captured. In most cases our CCTV will capture individuals who are identifiable in order to help in the prosecution of offenders.</p> <p>In some cases we have static cameras that cover a particular site to prevent criminal damage but in most cases the PTZ cameras used by us have the ability to zoom in and out at a distance and are used proactively to gather identities of individuals involved in criminal activity.</p> <p>All PTZ cameras that we have, have general pre-set positions which are used to obtain general coverage of an area which minimises personal data capture.</p>
10	Will the CCTV equipment being installed and the system of work being adopted be sustainable? Is there sufficient funding for the scheme?	<p>The councils CCTV system has a sustainable revenue budget through the charging of services including that of alarm/cctv monitoring for other councils.</p> <p>Any new cameras or equipment that are installed must have an allocated budget before installation.</p>
11	Will the particular system/equipment being considered deliver the desired benefit now and in the future?	<p>The councils CCTV system has been designed for resilience, future compatibility and expansion purposes. With technology constantly advancing and improving there will always be a need to upgrade equipment to ensure the CCTV continues to benefit.</p>
12	What future demands may arise for wider use of Images and how will these be addressed?	<p>In the future ANPR cameras may be used</p> <p>At present recorded images are only used for public safety and police investigations.</p>
Human Rights Act 1998		
1	Is the system established on a proper legal basis and is it operated in accordance with the law?	<p>The CCTV system was established under sec 115 of the crime and disorder act. It operates within the current legislation requirement and is lawfully compliant.</p>

2	Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?	<p>Like all populated areas; everywhere has its share of crime and disorder hence it is necessary for CCTV to be installed in order to achieve public safety and reduce crime.</p> <p>The council's constant commitment to the prevention and detection of crime resulted in a large investment into the Bury St Edmunds CCTV control room in order to serve the public in this endeavour to reduce crime in the local areas.</p> <p>Due to the success of this control room it has allowed for new cameras to be installed to better provide organisations including the police to take evidential footage to court and prosecute against offenders. This success is constantly portrayed in praises and thanks from constabularies and the continued statistics that are held in the control room.</p>
3	Is it justified in the circumstances?	Public CCTV is justified in that it prevents and deters crime and it has shown to be very beneficial to the council and emergency services which in turn is supported by the local residents and councillors.
4	Is it proportional to the problem that it is designed to deal with?	It is proportional to the problem it was designed to deal with. This is portrayed in the recent upgrade we undertook on the control room and the room for expansion on all the equipment.
5	Do any of these measures discriminate against any particular sections of the community?	All of the CCTV network used by the council does not discriminate against any particular sections or community. All staff are additionally trained and SIA licenced to ensure that legislation is adhered to.

## Level 2

### Step 1 (Definition of Camera Types Utilised)

*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.*

West Suffolk Council Coverage				
ID	Camera Types	Makes and Models used	Description	Justification and expected use
1	Fixed Internal Static Cameras	Varied	No PTZ – Range from standard to 1080p	Internal cameras that are located on the councils sites/offices. All cameras record 24/7 to prevent and detect crime and disorder, as well as ensure public safety and site security.
2	Fixed External Static Cameras	Varied	No PTZ – Range from standard to 1080p	External public space cameras located at council sites and offices. All cameras record 24/7 to prevent and detect crime and disorder, as well as ensure public safety and site security.
3	External/Internal PTZ	RedVision 720/1080p HikVision 1080p Mici 400	PTZ with 720/1080p imagery PTZ with 1080p imagery PTZ with standard picture	Pan Tilt and Zoom capability allows the camera to have several pre-sets configured to ensure the camera covers all areas needed.  Recorded 24hrs for the prevention and detection of crime and disorder, public safety, enforcement and other listed permitted uses under DPA.

## Step 2 (Location Assessment)

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.

Cam No (Bury St Edmunds)	Location	Camera Types used	Total	Recording/Monitoring	Assessment of use of equipment (mitigations or justifications)
Monitored on behalf of SEBC – 168					
2-3-5-6-7-8-9-10-11-12-13-14-15-29-30-31-34-35-36-37-38-39-50-53-54-55-71	Town Centre	1-2-3	27	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect crime for community safety.
41-42-43-44-45-46-47-48	Council Assets	1	8	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Protection of assets and council property.
63-64-65-66-67	Housing	1-2	5	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Article 6 1 (d) – processing is necessary in order to protect the vital interests of the data subject or of another natural person. Provide safeguarding to staff and residents, in case of any incidents.
72-73-74	Bus Station	1	3	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Internal cameras installed to prevent and detect criminal activity.
25-26-32-52-321-322-323	Estates/Parks	2-3	7	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras on the estates is to prevent and detect crime/ASB to ensure community safety.

94-95-96-97	Toilets – Ram Meadow/ Angel Hill	1	4	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Internal cameras installed to prevent and detect criminal activity.
1-4-16-17-18-19-20-21-22-23-24-27-28-33-40-75-76-57-58-59-60-61	Car Parks/Lorry Park	3	22	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to capture any RTC's/criminal damage that may be caused.
151-152-153-154-155-156-157-158-159-160-161-162-163-164-165-166-167-168-169-170-171-172-173-174-176-178	West Suffolk House (WSH)	1-2-3	26	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Internal and external cameras covering WSH building for public and staff safety as well as building security.
77-78-79-80	Housing/Toilets	2	4	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	External cameras covering entrance and exits to reduce ASB and criminal damage as well as building security.
301-302-303-304-305-306-307-308-309-310-311-312-313-314-315	The Apex	1-2-3	15	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Internal and External cameras covering The Apex public areas/hallways for public and staff safety/building security.
351-352-353-354-355	The Athenaeum	1-3	5	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Internal and External cameras covering The Athenaeum public areas/hallways for public and staff safety/building security
62	ARC	1-2-3	0	24/7 -This is a link shared by Arc Security giving us live images of any criminal activity occurring on their site	These cameras are the sole responsibility of Arc Security. Please contact them direct for their Privacy Impact Assessments.

401-402-403-404-405-406-407-408-409-410-411-412-413-414-415-416-417-418	Moyse's Hall	1-3	18	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Internal cameras installed for the purpose of the protection of assets and public safety.
451-452-453-454-455-456-457-458-459-460-461-462-463-464-465-466-467-468-469-470-471-472	West Stow	1-3	22	Monitored on site by staff who have completed own PIA.	Internal and external cameras installed for the purpose of the protection of assets and public/staff safety.
<b>Cam No (Haverhill)</b> Monitored on behalf of SEBC - 45	Location	Camera Types used	Total	Recording/Monitoring	Assessment of use of equipment (mitigations or justifications)
102-103-104-105-112-114-115-118	Town Centre	1-2-3	8	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity to ensure community safety.
125-126-128-129-130-131-132	Toilets- Camps Road and Bus Station	1-2	7	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity including ASB.
101-106-107-108-116-119-120-121-122-123-124	Car Parks	3	11	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to capture any RTC's/criminal damage that may be caused.
110-111-113-117-133	Estates/Parks	1-3	5	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras on the estates is to prevent and detect crime/ASB ensuring community safety



45-141-142-143-144-145-146-147-148-149	Haverhill House	1	10	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Internal cameras covering Haverhill House are present for public and staff safety as well as building security.
135-136-137-138	Haverhill Depot	1-3	4	24/7 -All monitored by SIA and NPPV2 vetted cctv operators All monitored by SIA and NPPV2 vetted cctv operators	External Cameras monitoring the depot have been installed for security and the protection of assets.
<b>Cam No (Newmarket)</b> Monitored on behalf of FHDC -18	Location	Camera Types used	Total	Recording/Monitoring	Assessment of use of equipment (mitigations or justifications)
201-202-204-205-206-225-226	High Street	3	7	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity to ensure community safety.
207-208-209-210-211-212-227-228	Car Parks	3	8	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to capture any RTC's/criminal damage that may be caused.
229-230	Toilet Block	3	2	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity including ASB.
44	Guineas	1	1	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity along with the protection of assets.

<b>Cam No (Mildenhall)</b> Monitored on behalf of FHDC - 22	Location	Camera Types used	Total	Recording/Monitoring	Assessment of use of equipment (mitigations or justifications)
213-214-215-216-219	High Street	3	5	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity to increase community safety.
217-218	Car Parks	3	2	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to capture any RTC's/criminal damage.
231-232-233-234-235-236-237-238-239-240	FHDC Offices	3	10	All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to detect and prevent crime as well as increase building and staff security.
251-252-253-254-255	Bus Station	1	5	All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to detect and prevent crime as well as increase building and staff security.
<b>Cam No (Brandon)</b> Monitored on behalf of FHDC- 5	Location	Camera Types used	Total	Recording/Monitoring	Assessment of use of equipment (mitigations or justifications)
220-221	High Street	3	2	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity and ensure community safety.

222-223-224	Car Parks	3	3	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to capture any RTC's/criminal damage.
<b>Cam No (Stowmarket)</b> Monitored for Mid Suffolk District Council - 14	Location	Camera Types used	Total	Recording/Monitoring	Assessment of use of equipment (mitigations or justifications)
81-82-83-84-85-86-87-88-90	Town Centre	3	9	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to prevent and detect criminal activity to increase community safety.
89-91-92	Car Parks	3	3	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to capture any RTC's/criminal damage.
93 -98	Park	1-3	2	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	Main purpose of these cameras is to capture any ASB/criminal activity to ensure community safety.
<b>Cam No (Ipswich) - 16</b> Monitored on behalf of Vertas Security group.	Location	Camera Types used	Total	Recording/Monitoring	Assessment of use of equipment (mitigations or justifications)
1001-1002-1003-1004-1005-1006-1007-1008-1009-1010-1011-1012-1013-1014-1015-1016	Endeavour House	1-2	16	24/7 -All monitored by SIA and NPPV2 vetted cctv operators	All responsibility of these surveillance cameras lies with SCC.  Please contact them direct for their own Privacy Impact Assessments.

## Highlighted Privacy Issue

Privacy Issue	Risk to individuals	Associated organisation/corporate risk	Solution	Evaluation
Collecting/Exceeding purposes of CCTV system	New surveillance methods may be unjustified intrusion on persons privacy	Loss of Reputation  Fines and Sanctions	Update technology to ensure that the collection of information and images does not exceed the primary functions of the service.	Privacy Zones should be activated where a cameras may intrude upon an individuals private residents. All data collected must at all times be justified, compliant and proportionate.
Retention of images/information for longer than necessary	Retaining personal images/information longer than necessary will breach people's personal data.	Loss of Reputation  Fines and Sanctions	Only allow recording of images/footage to be held for 31 days. Dispose of all other information that is not relevant to criminal investigation.	Retention of 31 days on all servers in place. Anything past the 31 days will be destroyed.
Lack of policies and procedures and mechanisms	No public availability of CCTV code of practice which details how personal data handled stored/disclosed	Loss of Reputation  Fines and Sanctions	Produce a code of practice and publish this on the website to increase transparency.	Code of Practice in place and published for transparency.
Signage	Public not made aware that they are entering an area which is monitored by a CCTV system	Loss of Reputation  Fines and Sanctions	Survey analysis to take place	Survey conducted to highlight areas where there is not enough signage. Signage to be installed where it is lacking as a priority.

Re-deployable Cameras	Public not made aware that they are entering an area which is monitored by a CCTV system	Loss of Reputation  Fines and Sanctions	Install signage in immediate area to inform public they are entering a CCTV monitored area.	Survey of area to be conducted for all re-deployable sites.
CCTV installed in housing	Tenants not made aware that they are entering an area which is monitored by a CCTV system	Loss of Reputation  Fines and Sanctions	Install Signage  Create full privacy notice informing tenants on how CCTV will be used.	Annual survey to ensure signage is still in place and full notice is up to date.
Intrusion into residential housing	Intrusive surveillance without a lawful basis and breaching data protection	Loss of Reputation  Fines and Sanctions	Enable privacy windows on cameras to ensure residential properties can not be viewed by operators	Monthly review of cameras to ensure privacy windows are still in place.

## LEVEL 3

1 How is information collected?

- CCTV camera     Body Worn Video
- ANPR     Unmanned aerial systems (drones)
- Stand-alone cameras     Real time monitoring
- Other (please specify)

5.2 Does the system's technology enable recording?

- Yes  No

Please state where the recording will be undertaken (no need to stipulate address just Local Authority CCTV Control room or on-site would suffice for stand-alone camera or BWV), and whether it also enables audio recording.

Recording takes place on sites owned by West Suffolk Council

Is the recording and associated equipment secure and restricted to authorised person(s)? (Please specify, e.g. in secure control room accessed restricted to authorised personnel)

Access to recording is kept secure on our managed network and access to footage can only be done through the control room.

5.3 What type of transmission is used for the installation subject of this PIA (tick multiple options if necessary)

- Fibre optic  Wireless (please specify below)
- Hard wired (apart from fibre optic,  Broadband please specify)
- Other (please specify)

5.4 What security features are there to protect transmission data e.g. encryption (please specify)

All cameras/footage are on a secure network with encryption.

5.5 Where will the information be collected from?

- Public places (please specify)  Car parks
- Buildings/premises (external)  Buildings/premises (internal public areas)

5.6 From whom/what is the information collected?

- General public in monitored areas (general observation)  Vehicles
- Target individuals or activities (suspicious persons/incidents)  Visitors
- Other (please specify)

5.7 What measures are in place to mitigate the risk of cyber attacks which interrupt service or lead to the unauthorised disclosure of images and information?

Patching of our systems is conducted on a monthly basis to minimise the risk of cyber attack.

Our network is also managed by our internal IT department and our systems are additionally PEN tested on an annual basis.

5.8 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 Automatic Facial Recognition software
- Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software
- Used to search for vulnerable persons
- Used to search for wanted persons
- Recorded data disclosed to authorised agencies to support post incident investigation by, including law enforcement agencies
- Recorded data disclosed to authorised agencies to provide intelligence
- Other (please specify)



5.9 How long is footage stored? (Please state retention period)

31 days unless requested to be downloaded for an on-going police investigation

5.10 Retention Procedure

- Footage 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)

If footage is required for evidential purposes in a police investigation then footage can be downloaded upon receiving a download request form.

5.11 With which external agencies/bodies is the information/footage shared?

- Statutory prosecution agencies     Local Government agencies
- Judicial system     Legal representatives
- Data subjects     Other (please specify)

5.12 How is the information disclosed to the authorised agencies

- Only by onsite visiting
- Copies of the footage released to those mentioned above (please specify below how released e.g. sent by post, courier, etc)

Offsite from remote server

Other (please specify)

5.13 Is there a written policy specifying the following? (tick multiple boxes if applicable)

Which agencies are granted access

How information is disclosed

How information is handled

Recipients of information become Data Controllers of the copy disclosed

Are these procedures made public?  Yes  No

Are there auditing mechanisms?  Yes  No

If so, please specify what is audited (e.g., disclosure, production, accessed, handled, received, stored information)

Our current system audits everything in regards to stored information

5.14 Do operating staff receive appropriate training to include the following?

Legislation issues

Monitoring, handling, disclosing, storage, deletion of information

Disciplinary procedures

- Incident procedures
- Limits on system uses
- Other (please specify)

5.15 Do CCTV operators receive ongoing training?

- Yes  No

5.16 Are there appropriate signs which inform the public when they are in an area covered by surveillance camera systems?

- Yes  No

Agreed with Teresa Claydon– CCTV Manager

Date: February 2019

Review date: February 2020

All cameras will be reviewed on an annual basis and any new additions to our system will be added

## The PIA process

