

CCTV Privacy Impact Assessment (PIA) – Body Worn Video (BWV)

Location of surveillance camera system being assessed:
West Suffolk Council CCTV control room

Date of assessment: 2024

Review date: 2025

Name of person responsible: Luke Porter

Level 1 considers the general details of the camera surveillance system and supporting business processes. Level 2 considers the specific implications for the installation and use of cameras.

Level 1

Data Protection Act 2018 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?	<ul style="list-style-type: none"> To assist in the prevention and detection of crime. To assist in the promotion of community safety and to reduce anti-social behaviour. To assist the client (system owner) in providing any of its prosecuting or contracted services. To assist in the management of the town centre – this includes monitoring safety or operationally critical activities on a particular site. To assist the council in the protection of assets.
2.	Can BWV technology realistically deliver these benefits?	BWV will certainly assist in the management of the town centre and will offer a level of safety to employees who operate the BWV, but it will also offer reassurance to members of the public.
3.	What are the views of those who will be under surveillance?	<ul style="list-style-type: none"> The BWV surveillance is supported by the council's endeavour and promise to make the towns in which it covers safer and more profitable for its residents and local businesses by preventing and deterring criminal activity. Assurance is given to members of the public that footage will only be accessed by our operators who are Security Industry Authority (SIA) approved and Non-Police Personnel Vetting (NPPV2) vetted by police.

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 BWV?	<ul style="list-style-type: none"> • BWV usage helps in the prevention and detection of crime. • BWV will create a much safer environment for members of the public and council workers alike. • BWV can provide vital evidence in legal proceedings.
6.	What are the privacy issues arising from this surveillance camera system?	Privacy issues include: <ul style="list-style-type: none"> • viewing of private space • recording of personal data • retention and deletion of footage • excessive or inappropriate monitoring.
7.	What privacy design features will be adopted to reduce privacy intrusion?	To ensure privacy, the council has adopted the following features: <ul style="list-style-type: none"> • All recorded images are automatically deleted either at 31 days or once storage space is used (whichever is sooner). • Evidence handling procedures are in place. • Management carries out random spot checks on operators' camera work to ensure there is no excessive or inappropriate monitoring. • System and network configurations are secure and managed by qualified and vetted engineers.
8.	What organisations will be using the CCTV images and who will take legal responsibility for the data under the Data Protection Act 2018?	Data users include: <ul style="list-style-type: none"> • data subjects • statutory prosecuting authorities (police) • clients and authorised investigators.
9.	Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?	<ul style="list-style-type: none"> • BWV will record at a minimum of 1080p with the purpose of capturing everything during an incident to ensure public and employee safety and to potentially be used as evidence if required. • BWV devices will only record once activated by an employee and they will inform whoever they are recording that the device has been activated to allow transparency.
10.	Will the CCTV equipment being installed, and the system of work being adopted, be sustainable? Is there sufficient funding for the scheme?	<ul style="list-style-type: none"> • The BWV system has a sustainable revenue budget through the charging of services. • Any new BWV cameras purchased must have an allocated budget prior to purchasing.

11.	Will the particular system or equipment being considered deliver the desired benefit now and in the future?	The council's BWV 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 BWV continues to benefit.
12.	What future demands may arise for wider use of images and how will these be addressed?	<ul style="list-style-type: none"> • In the future, BWV cameras may be used by other services with staff who are lone working. • At present, recorded images are only used for public and employee safety as well as police investigations.

Human Rights Act 1998

1.	Is the system established on a proper legal basis and is it operated in accordance with the law?	The CCTV system was established under section 115 of the Crime and Disorder Act. It operates within the current legislation requirement and is lawfully compliant.
2.	Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?	<ul style="list-style-type: none"> • The BWV system is necessary for the pressing need of public and employee safety when working on behalf of the council. • BWV systems have proven effective in other councils and law enforcement agencies when being used for safety and prosecution purposes.
3.	Is it justified in the circumstances?	BWV is justified in the circumstances of safety.
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 mainly due to the council now taking over all parking enforcement across the district.
5.	Do any of these measures discriminate against any particular sections of the community?	The CCTV network used by the council does not discriminate against any particular sections of the community.

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 that its use remains justified.

West Suffolk Council

ID	Camera types	Makes and models used	Description	Justification and expected use
1	BWV	Hytera	1080p	BWV cameras used and maintained by West Suffolk Council

Step 2: Location assessment

Each system operator or 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.

Camera number 24	Location	Camera types used	Total	Recording and monitoring	Assessment of use of equipment (mitigations or justifications)
1, 2, 3, 4, 5, 6, 7, 8, 9, 10, 11, 12, 13, 14, 15, 16, 17, 18, 19, 20, 21, 22, 23, 24	West Suffolk Council, MSCP Car Parking Services	BWV	24	1080p	All footage can only be accessed by SIA approved operators. Footage will only be used for police investigations or council disputes.
25, 26, 27	West Suffolk Council, Market Inspectors	BWV	3	1080p	All footage can only be accessed by SIA approved operators. Footage will only be used for police investigations or council disputes.

Highlighted privacy issue

Privacy issue	Risk to individuals	Associated organisation or corporate risk	Solution	Evaluation
Collecting or exceeding purposes of CCTV system	New surveillance methods may be unjustified intrusion on person's privacy.	<ul style="list-style-type: none"> • 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.	Once BWV are docked, footage will automatically upload to a server where it can only be accessed by SIA trained operators.
Retention of images or information for longer than necessary	Retaining personal images or information longer than necessary will breach people's personal data.	<ul style="list-style-type: none"> • Loss of reputation • Fines and sanctions 	Only allow recording of images or footage to be held for 31 days. Dispose of all other information that is not relevant to criminal investigation.	Retention of 31 days or until memory is at full capacity where data will automatically overwrite.
Lack of policies and procedures and mechanisms	No public availability of CCTV code of practice which details how personal data is handled, stored and disclosed.	<ul style="list-style-type: none"> • Loss of reputation • Fines and sanctions 	Produce a code of practice and publish this on the website to increase transparency.	Code of practice is in place and all BWV users undergo regular training.
Signage	Public not made aware that they are being recorded.	<ul style="list-style-type: none"> • Loss of reputation • Fines and sanctions 	Survey analysis to take place.	BWV will display CCTV recording red light. Users of BWV will verbally inform member of public that they are being recorded.
Intrusion into residential housing	Intrusive surveillance without a lawful basis and breaching data protection.	<ul style="list-style-type: none"> • Loss of reputation • Fines and sanctions 	Code of practice outlines to users of BWV that activation of BWV can only be used in a public setting.	Footage will be regularly reviewed to ensure BWV users are complying with the code of practice.

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

The PIA process

The diagram below shows the six stages of the PIA process.

The PIA process

