



# PRIVACY IMPACT ASSESSMENT

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The below form is designed to assist you in carrying out a privacy impact assessment (PIA).

## Privacy Impact Assessment screening questions

These questions are intended to help you decide whether a PIA is necessary in the first instance.

Name of Person Responsible Paul Leonard (Control Room Manager)

Date of Assessment: 8<sup>th</sup> June 2021

Review Date: 8<sup>th</sup> July 2022

Camera location (if applicable)

Camera Number and type (if known)

Camera type (PTZ, Static etc.)

Is CCTV system covered by ICO registration number?  Yes  No

If so, please state

Has the Surveillance Camera Code of Practice self-assessment tool been used to assist in completion of this PIA?  Yes  No

Will this proposed installation be part of an existing CCTV system certified to the Surveillance Camera Code of Practice?  Yes  No

### Checklist

Answering 'yes' to any of the following questions is an indication that a PIA would be a useful exercise. You can expand on your answers as the project develops if you need to.

Introduction of a new surveillance camera system or additional camera (includes static cameras) which can collect new personal information about individuals  Yes  No

Changing location and/or field of view of an existing camera  Yes  No

Upgrading cameras which can obtain additional views or enhanced views which may impact on privacy e.g. HD cameras, IR lighting, more powerful lenses, 360 degree cameras  Yes  No

Introduction of new technology that may affect privacy (e.g. Automatic Number Plate Recognition, Body Worn Video, Automated Recognition Technology, Unmanned Aerial systems (Drones) or similar  Yes  No

If so, please state

Using re-deployable cameras (to be completed for every new deployment)  Yes  No

Installation of the camera results in decisions or action against individuals in ways that can have significant impact on them (this would include, fine, notifying police,  Yes  No

patching through images of suspects to police control rooms and Regulation of Investigatory Powers Act 2000 – RIPA)

Is the information collected about individuals of a kind likely to raise privacy concerns or expectations? For example, criminal records or other information that people would consider particularly private. (Note: may include radio transmissions from the CCTV Control room to store watch and pub watch systems. These regularly mention individuals and their previous convictions which can be heard by members of the public as well as suspect. The risk would need to be identified in the PIA and the solutions addressed.)

Yes  No

Introduction of Wi-Fi, microwave, GSM, airwave transmission etc. (Is it encrypted?)

Yes  No

If so, please state

Dedicated log in and password and dedicated SSID number

Extending periods of recording  Yes  No

Upgrade in recording frames per second (increase in image capture)  Yes  No

Analogue to digital recording  Yes  No

Where other agencies/organisations are involved in activities where there is potential for privacy to be compromised, e.g. monitoring, handling, processing, sharing data/images etc.  Yes  No

Any alteration to the way images and data are handled, viewed, processed, disclosed, shared, disposed, retrieved, accessed, stored  Yes  No

Any other process or use which increases the risk to privacy  Yes  No

If so, please give details

Does the introduction of a camera system or individual camera increase the risks to the Organisation? E.g. potential non-compliance with data protection or other legislation, legal actions by individuals, etc.  Yes  No

If you tick 'YES' to any of the above, please complete the following PIA. If in doubt it would be advisable to complete a PIA anyway and inform the system manager of your decision to do so.

# Privacy Impact Assessment

## 1. Identify the need for a PIA

The following are examples of some of the possible aims of the installation/project. If applicable tick one or more of the following aims then briefly explain what the benefits will be to the organisation, individuals and other parties. If there are other aims please detail and explain.

You can refer to other documentation related to the proposed installation or project e.g. Operational Requirement, business case, project proposal, feasibility survey etc.

### 1.1 Aims

- a. reducing the fear of crime
- b. deterring and preventing crime
- c. assisting in the maintenance of public order and reducing offences
- d. provide high quality evidence which may assist in the detection of crime and the apprehension and prosecution of offenders
- e. protecting property
- f. providing assistance with civil claims
- g. providing assistance with issues relating to public safety and health
- h. providing assistance and reassurance to the public in emergency situations
- i. Assist with traffic management
- j. Recognition of number plates (ANPR)
- k. Other, please specify

### 1.2 Benefits

Having identified the aims please explain the benefits to Stockton Borough Council, to individuals and to other parties. This could include such things as reduction in crime and offences, reduction in fear of crime, detection of anti-social behaviour etc. The benefits should be capable of being measured and not anecdotal (If you have completed an operational requirement (OR), as recommended, in relation to this PIA please refer to the OR for risk analysis)

The overarching aim of the system is to contribute to making the community of Ingleby Barwick a safer and more welcoming place to live and visit. The specific benefit of the system is to provide independent evidence to support a number of legitimate legal aims in support of improving community safety such as the prevention and detection of both criminal offences and anti-social behaviour in the area.

The secondary aim of the system is to contribute in the overall partnership effort to deny criminals use of the road network around Stockton on Tees of which Ingleby Barwick has a number of key arterial road routes in and out of the area with a large volume of vehicle movements. Finally, the system is intended to contribute to improving the perception and fear of crime and disorder as well as helping the council manage the road network efficiently.

Stated Aim - Prevention and Detection of Crime / Reduction of Crime

In the financial year 2020/2021, a total of 1,959 crimes or reports of anti-social behaviour were recorded in Ingleby Barwick (Stockton Partnership Strategic Assessment, 2021). This included a total of 161 incidents involving vehicle related issues such as anti-social driving. A further 53 offences related to theft, with an additional 21 offences relating to vehicle crime and 31 burglaries.

This is an increase of 250 incidents compared to 2019/2020 and 278 incidents compared to 2018/2019 despite a range of multi-agency interventions on the estate including additional partnership patrols and interventions such as youth engagement / direction, improvement in street lighting and problem solving work. The area also benefits from additional funding for the Civic Enforcement Service, providing additional resources for problem solving and responding to key community safety issues. Whilst these measures have been successful by certain measures, it is clear more needs to be done to positively impact on the levels of crime in the area.

By increasing the available network of traditional CCTV cameras, it is expected that the overall level of recorded crime and anti-social behaviour can be reduced for the benefit of the community similar to that seen in other parts of the country.

#### Stated Aim - Deterrence

Local Authorities are also expected to implement new and innovative ways of improving community safety, such as new technologies. By having an available network of CCTV installed around the scheme locality, those using the road network for criminal behaviour run the reasonable risk of being detected in doing so whilst also reducing the privacy impact on those road users going about their lawful business.

#### Stated Aim - Improving Perception and Fear of Crime

Whilst significant intervention work and investment has been undertaken in both Stockton on Tees and indeed Ingleby Barwick in the past decade, crime and anti-social behaviour continues to be a significant concern for residents. Research has shown that the public perception and fear of crime and disorder has increased in Stockton and is also the case in Ingleby Barwick. The fear of crime can have a significant impact on the health and wellbeing both of individuals and of whole communities. Recent events in Ingleby Barwick which has resulted in media and political coverage have continued to evidence this strong feeling within the community for new and innovative measures to improve safety are needed.

A public consultation conducted between February and April 2021, by the Safer Stockton Partnership (Community Safety Partnership) evidenced clearly that the majority of responders felt that both the levels of crime and anti-social behaviour had increased within their community despite official recorded figures showing a reduction in many areas. Furthermore a total of 63% reported feeling less safe in their community than they did a year ago. Key issues identified included drugs, anti-social behaviour and burglary as key concerns with more resources and CCTV being a key theme that residents wanted to see introduced as an intervention.

A total of 27% of the overall responses to the consultation came from residents who provided an Ingleby Barwick postcode (TS17).

These findings are further supported by the outcome of a MORI survey conducted in 2019. This consultation highlighted that people felt significantly less safe during the day and night whilst in the community compared to findings in 2015.

In light of these findings, it is intended that a new and innovative approach to community safety benefiting from technological advancements in improved CCTV to support the multi-agency partnership, will in part help restore confidence and improve perceptions around crime and ASB in the future. This will be measured and evidenced by improvements in public consultation outcomes and engagement with the community specifically through existing methods such as community groups, elected members and ward surgeries for example.

### 1.3 Summarise why the need for a PIA was identified

Completion of the screening questions will assist in identifying the need for a PIA.

Possible needs might include:

- a. Capture of new personal data/images
- b. New or additional locations/areas which have potential for privacy implications
- c. Use of new technology which is capable of capturing enhanced images e.g. BWV, automated recognition, 360 degree views, higher powered equipment, etc
- d. Surveillance camera systems with audio recording capability e.g. BWV
- e. Alteration to the way images and data are handled, viewed, processed, disclosed, shared, disposed, retrieved, accessed, stored
- f. Use of technology which captures vehicle registration numbers (ANPR)
- g. Other, please specify

## 2. Describe the information flows

You should describe the collection, use and deletion of personal data here and it may also be useful to refer to a flow diagram or another way of explaining data flows.

### 2.1 How is information collected?

- |   |   |
|---|---|
| <input checked="" type="checkbox"/> CCTV camera | <input type="checkbox"/> BWV                              |
| <input type="checkbox"/> ANPR                   | <input type="checkbox"/> Unmanned aerial systems (drones) |
| <input type="checkbox"/> Stand-alone cameras    | <input type="checkbox"/> Real time monitoring             |
| <input type="checkbox"/> Other (please specify) |   |

### 2.2 Does the systems 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)

The images recorded by the camera will viewed and stored at an approved Stockton on Tees Borough Council premise as an addition to the current surveillance network in place.

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)

The recorded images and associated recording equipment are secure within the control room of the building. The building housing the control room was originally built utilising the specifications of 'BS 5979 Category 2 - Alarm Receiving Centre British Standards'. The building has an electronic gated entrance aswell as internal and external CCTV to control access from the site. A 24 hour security

provision is in place at the site. Access to images is permitted only to authorised employees, Police for official investigations and other relevant authorised enforcement or regulatory agencies.

**2.3 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, please specify)
- Broadband
- Other (please specify)

The transmission is on a independantly secured wirelss network, which forms part of the wider surveillance scheme in Stockton on Tees.

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

Safeguards, including technical, organisational and physical security measures are in place to prevent unauthorised access to, and maintain the integrity of, images and information obtained through surveillance. The Council holds ISO 27001 certification and has Cabinet Office approval - Public Services Network (PSI).

**2.5 Where will the information be collected from?**

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

All cameras which form part of this scheme are located in the public realm, at the side of an adopted highway owned and maintained by the local authority.

- Other (please specify)

**2.6 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)

**2.7 Why is the information being collected? (Please refer to additional documentation where available)**

- Crime prevention and detection
- Parking enforcement
- Missing person(s)
- Traffic control purposes
- Intelligence
- Other (please specify)

The primary purpose of the scheme is to collect information via CCTV cameras for the detection and prevention of crime in Ingleby Barwick.

**2.8 How is the information used? (tick multiple options if necessary)**

- Used by CCTV operators to detect and respond to unlawful activities in real time
- Used by CCTV operators to track and monitor suspicious persons/activity
- Used to search for vulnerable persons
- Used to search for wanted persons
- Used to support post incident investigation by authorised agencies, including judicial system
- Used to provide intelligence for authorised agencies
- Other (please specify)

**2.9 How long is footage stored? (please state retention period)**

All footage is stored for 31 full days before being auto-deleted from the system. Appropriate manual audit safeguards to ensure this occurs are also in place.

**2.10 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)

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

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



## 2.12 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)

Footage can be released to those mentioned via pre-existing evidence sharing procedures. This can be done in physical form by visiting the centre and signing for evidence or via an approved digital sharing solution.

## 2.13 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)

The entire data collection, processing, storage, retention and dissemination is audited by the Data Controller as required under the relevant statutory provision and associated guidance and best practice regulations. Further independent auditing undertaken by certified inspectors such as National Security Inspectorate and Surveillance Commissioner.

## 2.14 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)

## 2.15 Do CCTV operators receive ongoing training?

Yes      No

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

Yes      No

### 3. Consultation requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted internally and externally? How will you carry out the consultation?

You can use consultation at any stage of the PIA process. It will be necessary to concentrate any consultation into 'privacy issues'.

Note: there are guidelines on consultation for the public sector issued by the Cabinet Office and elsewhere in this guidance.

#### 3.1 Who have you consulted with? (tick multiple options if necessary)

##### Internal Consultations

- |   |  |
|---|--|
| <input checked="" type="checkbox"/> Data Protection officer | <input checked="" type="checkbox"/> Engineers, developers, designers, installers |
| <input type="checkbox"/> Information Technology             | <input type="checkbox"/> Planning  |
| <input type="checkbox"/> Procurement                        | <input type="checkbox"/> Data Processors   |
| <input type="checkbox"/> Corporate governance/Compliance    | <input checked="" type="checkbox"/> Research, analysts and statisticians         |
| <input checked="" type="checkbox"/> Senior management       | <input checked="" type="checkbox"/> Other (please specify)                       |

##### External Consultations (tick multiple options if necessary)

- |   |   |
|---|---|
| <input type="checkbox"/> General public                           | <input type="checkbox"/> Local residents          |
| <input type="checkbox"/> Business                                 | <input type="checkbox"/> Education establishments |
| <input checked="" type="checkbox"/> Elected Members (Councillors) | <input type="checkbox"/> Other (please specify)   |

#### 3.2 How did you undertake the consultation with the above (e.g. focus groups, on-line public survey, public meetings, targeted mail survey, etc)? (please explain)

Consultation conducted as part of a project focus group involving key strategic partners and elected Members.

#### 3.3 Is feedback available to view?

- Yes       No

#### 3.4 What feedback did you have and have you acted on it? (please explain or attach results)



## 5. Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

Note: please mark any 'privacy by design' solutions with an asterisk \*

Risk	Solution(s)	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?
Collection of images/information exceeds purposes	Restrict collection of images/information to identified purposes and locations. Implement appropriate technological security measures and document these.	Reduced	If the images were reduced to the identified purposes by introducing 'Privacy zones'. The collection of images/ information would be justified, compliant and proportionate
Retention of images/information	Introduce retention periods to only keep information for as long as necessary. These are specified in the publicly available CCTV Codes of Practice.  Introduce automatic system safeguards and ensure auditable checking of system.	Reduced	As stated retention periods introduced and specified are justified, compliant and proportionate to data protection legislation.  Additional manual check of automated system to safeguard system failure.
Lack of policies and procedures and mechanisms	Produce policies for handling, storage, disclosure of images/information and make them publicly available in the CCTV Codes of Practice.	Eliminated	Relevant policies now available as stated, online.  This is now justified, compliant and proportionate as audited by the National Security Inspectorate.
Lack of signage	Gap analysis of area covered by CCTV system to ascertain if there is prominently placed signage at the entrance to the area monitored and also within that area. All signs to be audited regularly.  Ensure appropriate signage in place in the immediate area around the cameras installed as part of the scheme.  Consider additional signage in the approaching areas as a supplement.	Reduced	Gap analysis indicated not enough prominent signs. Now installed an additional sign to the column of the camera as part of the scheme. This is now justified, compliant and proportionate.

Risk	Solution(s)	Result: is the risk eliminated, reduced, or accepted?	Evaluation: is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project?



