

CCTV Privacy Impact Assessment

Assessment Carried Out By:	Chadley Phillips	Date of Assessment:	04/04/2019
Camera ID(s):	30, 31 PTZ	Camera(s) Location:	O/S Premier Shop, 10 Park Street, Treforest, Pontypridd, CF37 1SN
NVR/DVR Model: NVR/DVR Serial:	DS-7604NI-E-4P-A 6*****860		

The reason and aims of why we are introducing or considering CCTV?

- Crime and Disorder
- Anti-social Behaviour
- Hate Crime
- Youth Annoyance
- Security
- Intelligence

Other:

- Drug & Alcohol Related Issues

The benefits of introducing and or using CCTV?

- Reducing the fear of crime, disorder and ASB
- Detering and preventing crime
- Protecting property
- Protecting assets
- Providing assistance and reassurance to the public in emergency situations
- Providing assistance with issues relating to public health and safety.
- Assisting in the maintenance of public order and reducing offences
- Provide high quality evidence which may assist in the detection of crime and the apprehension and prosecution of offenders
- Providing assistance in civil claims
- Providing assistance in relation to tenancy disputes and breaches of tenancy agreements/ policies

Can CCTV deliver the benefits listed above?

Yes– we believe that CCTV Systems can realistically deliver all of the benefits listed above in this Privacy Impact Assessment.

Can other solutions that are less privacy intrusive be installed to achieve the same objectives?

No– other solutions can be introduced such as improved lighting and property alarms but they will only add towards the benefits of using CCTV. Ultimately, CCTV is the best solution.

Do we need images of identifiable individuals and or vehicles?

Yes– as part of our reasons and aims of introducing CCTV, we need the footage of individuals and vehicles to reach our benefits of using the CCTV System / Scheme. The high quality footage will produce sufficient evidential images for use in investigations and prosecutions. All footage will be treated in compliance with our CCTV Policy.

The views of those who will be under surveillance on a daily basis:

Please see attached consultation documents.

Will the CCTV System deliver the desired benefits now and remain sustainable for the future?

Yes– the system will be maintained by a qualified CCTV engineer to ensure that the equipment is kept updated and in a working order. As and when required, equipment will be replaced to ensure we get the maximum out of the system.

Is CCTV the best answer and proportionate to the problem and the reasons of introducing or considering CCTV?

Yes– the CCTV System will have the desired effect that we need for the problems.

Is it justified in the circumstances?

Yes

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Does the systems technology enable remote monitoring and recording?

Yes– the CCTV cameras are remotely monitored off-site at our main office. The recording of footage is done at the site of the CCTV camera via NVR/DVR Recorder. Security is in place to prevent un-authorized access to the recording footage and monitoring equipment.

How is the information collected?

- PTZ (Pan, Tilt, Zoom) cameras
- Real time monitoring
- Recorded footage stored on NVR's/DVR's

Transmission used for the CCTV Systems

- POE & Standard Ethernet (Power over Ethernet) / Wireless Bridge Network
- Broadband
- Fibre Optic

What security features are in place to protect the transmission of data?

- Encryption Software
- Passwords and Passphrases

Where is the information collected from?

- Buildings/Premises Externally
- Public Spaces– roads and footpaths

From who/what is the information collected from?

- General Public in Monitored Areas– general observation
- Target Individuals and or Activities (suspicious persons/incidents)
- Vehicles in Public Areas
- Tenants or Occupants from Managed Property
- Local Business's

How is the information used by the System Operators

- 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 by CCTV operators to monitor general areas in general observation tasking
- Used to gather intelligence for authorised agencies
- Used to support post incident investigations
- Used for evidential purposes including prosecutions

How long is the data (footage) stored for?

Please refer to the CCTV Policy– no more than 30 days unless under certain circumstances

How does the data (footage) get deleted after the retention period?

- Footage is overridden once the NVR/DVR reaches capacity
- Footage can be manually deleted from the system
- Under certain circumstances, authorized persons may override the retention period in order to save data relating to incident or investigations.

With which external bodies/agencies/organisations is the data/information or footage shared with?

- Statutory prosecution agencies
- Judicial system
- Data subjects
- South Wales Police
- Local Government agencies
- Legal representative
- Rhondda Cynon Taff County Borough Council
- Any other deemed necessary by the Scheme Manager

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How is the footage/data shared and disclosed with authorised bodies/agencies/organisations?

- Visiting the site of the CCTV Camera / System
- Visiting the office in which monitors the CCTV
- Remotely via application on mobile phone
- Copies on discs, USB sticks
- Secure File Sharing Software / System
- Provided in person, not through the postal system

Is there any policy in relation to handling the footage/data?

Yes– all data/footage must be handled in compliance with our CCTV Policy referring to all Data Protection Acts and Legal Frameworks. The bodies/agencies/organisations receiving the data/footage must also comply with the CCTV Policy. All footage is Copy Right protected by Phillips Property Management (South Wales) LTD.

Is there appropriate training for the system operators? What are the staff made aware of?

- Legislation
- Monitoring, handling, disclosing, storage of data/footage
- Disciplinary procedures for breach of policy
- Incident procedures– witnessing crime, ASB, Suspicious behaviour etc.
- SIA CCTV Licensed

Staff are in-house trained on how to operate the System and must comply with all Policies / Documents relating to the system.

Privacy risks related to the CCTV System / Scheme

Privacy Issue	Risk to Individuals	Compliance Risk	Associated Organisation / Corporate Risk
Collecting/exceeding purposes of the CCTV System/Scheme	New surveillance methods may be unjustified intrusion on persons privacy	Non-compliance with Data Protection & Human Rights Acts. Non-compliance with relevant polices	Loss of reputation Fines and Sanctions Complaints
Retention of data/footage/ information for longer than necessary	Owner retaining personal data/ footage/information longer than necessary	Non-compliance with Data Protection & Human Rights Acts. Non-compliance with relevant polices	Loss of reputation Fines and Sanctions Complaints
Lack of polices relating to the CCTV Scheme / System	No public availability on polices that details on how the system is operated and its associated polices of use	Non-compliance with Data Protection & Human Rights Acts. Non-compliance with relevant polices	Loss of reputation Fines and Sanctions Complaints
Lack of signage	Public, Tenants, Visitors and Staff unaware that they are entering or in a area that is monitored by CCTV	Non-compliance with Data Protection & Human Rights Acts. Non-compliance with relevant polices	Loss of reputation Fines and Sanctions Complaints
Unauthorised access to CCTV Systems / Scheme	Persons who do not have permission could be able to view live or recorded footage on the system	Non-compliance with Data Protection Acts Non-compliance with relevant polices	Loss of reputation Fines and Sanctions Complaints
Confidential/Restricted footage, images or data	Data, footage or images being seen or viewed by persons which is marked as restricted or confidential	Non-compliance with Data Protection Acts Non-compliance with relevant polices	Loss of reputation Fines and Sanctions Complaints

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Reducing or removing the Privacy Risks

Privacy Issue	Approved solution to reduce or remove the risk
Collecting/exceeding purposes of the CCTV System/Scheme	Restrict the collection of images/footage/information to identified purposes and locations. Review the need for the System as per CCTV Policy states. Review to location of the camera as part of the System review in order to see if the camera is still required at the location or if it can be relocated to another site.
Retention of data/footage/information for longer than necessary	Follow CCTV Policy. Operator will manually check to ensure that any data recorded is deleted as per the CCTV Policy states.
Lack of policies relating to the CCTV Scheme / System	Ensure that the CCTV Policy is kept maintained and reviewed annually to ensure compliance with any legal regulations and frameworks. The scheme manager will ensure that all relevant documents are in place.
Lack of signage	Site visits are carried out to ensure adequate signage is in place and visible for persons to see. Signage will be checked from time to time to ensure that it's still in place and replaced when needed.
Unauthorised access to CCTV Systems / Scheme	The scheme manager will ensure that access to all parts of the systems will be restricted to authorised users/operators only. Passwords and encryptions will be used on DVRs/NVRs and access to monitoring stations is restricted by door locks and passwords to mobile devices.
Confidential/Restricted footage, images or data	Data marked as restricted or confidential will be kept secure and only persons who have permission to use, view or share the data will have access. Data files saved on PC's will be protected by a password and marked clearly as "Confidential" and or "Restricted".

END OF ASSESSMENT