

CCTV Requirement Assessment and Privacy Impact Assessment

Template for 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 looks at privacy in a wider context taking into consideration both the Data Protection Act and the Human Rights Act. The PIA should consider the pressing need that the system seeks to address and the impact it 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 and follow the instructions issued in the ICOs 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 always be considered when you are reviewing your surveillance camera systems and when you are considering introducing new technology allied to them.

Assessment of requirement for surveillance camera

1.	Who has made the original request for CCTV or identified an issue(s) that needs to be addressed. (Record multiple requesters where applicable)	
2.	Where is the location being assessed?	
3.	What is the issue/crime that has occurred at that location?	
4	On how many occasions have the identified activities occurred according to local sources?	
5	<p>What type of location has been identified and give key features?</p> <p><i>E.G. Open space, play park, Car Park, residential, public building, shops (single or multiple), public house, public toilets, alleyway, night time economy activity, bank.</i></p>	
6.	Does Police data support that there is activity that is detectable using CCTV?	
7.	<p>What other Community safety and Police responses have been considered? Have these alternatives been employed? Give details...</p> <p>Have other less privacy-intrusive solutions such as improved lighting been considered?</p> <p><i>(There is a need to consider other options prior to the use of cameras. For example</i></p>	

	<p><i>could improved lighting deliver the same benefit? Does the camera operation need to be 24/7? Where these types of restrictions have been considered provide reasons for not adopting them and opting to use surveillance cameras as specified)</i></p>	
8.	<p>Why is a surveillance camera considered to be the most effective way to solve the issues?</p> <p>What are the benefits to be gained from using CCTV?</p> <p><i>(Give specific reasons why this is necessary compared to other alternatives. Consider if there is a specific need to prevent/detect crime in the area. Consider if there would be a need to reduce the fear of crime in the area and be prepared to evaluate)</i></p>	
9.	How will the surveillance camera system will be used to address the problem?	
10.	How will success be measured (i.e. evaluation: reduction in crime, reduction of fear, increased detection etc)?	
11.	Is the surveillance activity established on a proper legal basis and is it undertaken in accordance with the law? (Yes / No)	

12.	Is the surveillance activity necessary to address a pressing need, such as public safety, crime prevention or national security? (Yes / No)	
13.	Is it justified in the circumstances? (Yes / No)	
14.	Is it proportionate to the problem that it is designed to deal with? (Yes / No)	
15.	<p>Is there funding available; within budget, from other organisations or through the budget process? (Give details)</p> <p><i>(Consideration should be given as to how the revenue costs e.g. monitoring, transmission, are going to be met to ensure that the systems remains effective and justified over its projected lifespan. State how long funding has been secured for)</i></p>	
16.	Are there technical resources available to support an additional camera within the scheme? (Yes / No)	
17.	<p>What are the views of those who will be under surveillance?</p> <p><i>(Please outline the main comments from the public resulting from your consultation - Some consultation should be undertaken in the area being considered for a surveillance</i></p>	

	<p>camera scheme. This can often be achieved by existing local consultation mechanisms such as local area committees, police beat</p>	
18.	<p>What are the privacy issues arising from this surveillance camera system?</p> <p><i>(State the main privacy issues relating to this particular system. For example extent of information recorded, will it only be on those who are suspects or include those who are not, concerns arising from its use, retention and disclosure, likely expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective)</i></p>	
19.	<p>What privacy design features will be adopted to reduce privacy intrusion?</p> <p><i>(State the privacy enhancing technical and other features that have been identified, considered and accepted or rejected. For example, has consideration been given to the use of technical measures to limit the acquisition of images such as privacy zones installed on cameras that overlook residential properties etc? If these have not been adopted, provide a reason)</i></p>	

	<p>What organisations will be using the CCTV images and who will take legal responsibility for the data under the Data Protection Act 1998?</p> <p><i>(List the organisation(s) that will use the data derived from the camera system and identify their responsibilities giving the name of the data controller(s). Specify any data sharing agreements you have with these organisations)</i></p>	
20.	<p>Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?</p> <p><i>(Explain why images that can identify people are necessary in practice. For example cameras deployed for the purpose of ensuring traffic flows freely in a town centre may not need to be able to record images of identifiable individual's whereas cameras justified on the basis of dealing with problems reflected in documents showing the current crime hotspots may need to capture images of identifiable individuals)</i></p>	
21.	<p>Will the particular system/equipment being considered deliver the desired benefit now and in the future?</p>	

	<p><i>(State how the system will continue to meet current and future needs including your review policy and how you will ensure that your system is up to date. It is recommended that you conduct a minimum of an annual review of your system in order to consider whether it is still appropriate and able to meet the specified need it was set up to deliver)</i></p>	
22.	<p>What future demands may arise for wider use of Images and how will these be addressed?</p> <p><i>(Consider whether it is possible that the images from the surveillance camera scheme will be used for any other purpose, e.g. traffic monitoring, enforcement, ANPR in future and how such possibilities will be addressed. Will the cameras have a future dual function?)</i></p>	
23.	<p>Is the system established on a proper legal basis and is it operated in accordance with the law?</p> <p><i>(State the statutory or other powers which provides the basis for the activity)</i></p>	
24.	<p>Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?</p> <p><i>(Articulate the problem and why this is a pressing</i></p>	

	concern)	
25.	<p>Is it justified in the circumstances?</p> <p><i>(please provide the justification)</i></p>	
26.	<p>Is it proportional to the problem that it is designed to deal with?</p> <p><i>(Explain why the level of privacy interference is proportionate to the overall privacy impact)</i></p>	
27.	<p>Do any of these measures discriminate against any particular sections of the community?</p> <p><i>(Detail whether the proposed surveillance will have a potential discriminatory or disproportionate impact on a section of the community. For example establishing a surveillance camera system in an area with a high density of one particular religious or ethnic group)</i></p>	
28.	What type of camera is being considered?	
29.	Is audio recording a feature?	
30.	<p>Is ANPR, facial recognition, and/or movement analysis a feature?</p> <p>Give details of software and function.</p>	

#	CCTV assessment conclusion.	
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Date of assessment:

Review date:

Name of person responsible:

