



**SURVEILLANCE CAMERA  
COMMISSIONER**

# **PASSPORT TO COMPLIANCE**

**STAGE 1**

**PLANNING AND FEASIBILITY**

# SECTION 1

## 1.1 Justification

The *Passport to Compliance stage 1 planning and feasibility guidance notes* will help you to build a case for the justification of activity to address an identified problem and whether or not that activity should be the introduction of a CCTV system.

### 1.1.1 Define the scope, scale, nature and extent of the problem

State, in the box below, the **problem, or problems**, that the proposed CCTV system is seeking to address.

Outline, in the box below, the **nature and extent** of the problem, or problems, that the proposed CCTV system is seeking to address.

### 1.1.2 Causal factors

In the box below, outline the causal factors underpinning the problem, or problems, that the proposed CCTV system is seeking to address. The *Passport to Compliance stage 1 planning and feasibility guidance notes* will assist you.

### 1.1.3 Risk Assessment

There are a number of different issues you should take into account, when assessing the likelihood of a problem occurring and its likely impact. The most significant of these are laid out in the checklist below, which you can use to help build your understanding of the risk. There is space in for you to add comments, if appropriate.

**What is the risk of the problem occurring?**

- Already occurring     High     Medium     Low

Any comments

**What is the actual/likely severity of the impact of the problem?**

Is the problem likely to have a significant impact on individuals, vulnerable groups, business, the environment or other groups?

You should also consider how that impact manifests itself e.g. increased fear of becoming a victim amongst elderly residents, reduction in numbers of people using the town centre at night.

- High                       Medium                       Low

Any comments

**How important is it to control the problem?**

You should consider what the consequences will be if you fail to control the problem.

- Highly                       Moderately                       Of little importance

Any comments

**Is the problem anticipated to be short-term/transitory; seasonal or long-term?**

You should consider whether or not the problem is a “one-off” short-term issue or something more permanent, or occurring on a seasonal basis.

- Short-term                       Seasonal (repeating at certain times in the year)                       Long-term

Any comments

In completing this checklist, you will build your understanding of the risk associated with the problem in terms of likelihood and impact. This will in turn help to influence decisions regarding whether and how the problem might be addressed. As a result, you should give due careful consideration to how you answer these questions.

**1.2 Objectives of the required solution**

In the box below, outline the objectives for the intervention that you would seek to implement to address the identified problem. You can use the *Passport to Compliance stage 1 planning and feasibility guidance* notes to help you if necessary.

### 1.3 Consideration of existing provision – can the problem be resolved by current solutions?

In the box below outline whether or not the problem can be resolved by using current solutions and the reasons for your decision. You can use the *Passport to Compliance stage 1 planning and feasibility guidance notes* to help you if necessary.

### 1.4 Statement of need

If it is decided that CCTV is required to address the identified problem, in the box below, you should now outline your statement of need. Again, the *Passport to Compliance stage 1 planning and feasibility guidance notes* will assist you in this.

### 1.5 Proposed broad outline solution

#### 1.5.1 System

There now needs to be agreement regarding the appropriate CCTV intervention to resolve the problem.

#### 1.5.2 Required/available budget

The template below enables you to start to build a budgetary requirement for the proposed CCTV system. You should add other factors and associated costings that are not included below, but which are directly relevant to your system requirement. The *Passport to Compliance stage 1 planning and feasibility guidance notes* can assist you in this process.

#### Budgetary requirement

Cost heading	£	£
System costs – Hardware		
System costs – Software		
System costs – Installation		
Staff costs – Direct		
Staff costs – Indirect		
Training		
Service costs – Maintenance and repair		
Service costs – Other		
Consultancy		
Consumables		
Accommodation		
Equipment		
<i>Other costs (list below)</i>		
<b>Total required budget</b>		

### 1.5.3 Public consultation – design, disseminate, collate, analyse

In the box below, you may want to outline how you propose to consult with the public, if appropriate. You might also want to outline your public consultation “document”, who will carry out the consultation and associated timescales. Again, the *Passport to Compliance stage 1 planning and feasibility guidance notes* can assist in this process.

In the box below, you may now want to summarise the results of the analysis of the data emerging from the consultation process.

### 1.5.4 Stakeholder consultation

In the box below, you may wish to summarise key points emerging from the stakeholder consultation process. The guidance in relation to public consultation in the *Passport to Compliance stage 1 planning and feasibility guidance notes* is also relevant here.

## 1.6 Privacy Impact Assessment (PIA)

The template below is designed to assist you in carrying out a Privacy Impact Assessment.

### 1.6.1 Privacy Impact Assessment screening questions

These questions are intended to help you decide whether a PIA is necessary.

Camera location (if applicable)

Camera Number (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, patching through images of suspects to police control rooms and Regulation of Investigatory Powers Act 2000 – RIPA)  Yes  No
- 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

- 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.

## 1.6.2 Privacy impact assessment template

This template is an example of how you can record the PIA process and results. You can start to fill in details from the beginning of the project, after the screening questions have identified the need for a PIA.

## SECTION 2

### 2.1 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.

### 2.2 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

### 2.3 Benefits

Having identified the aims please explain the benefits to your organisation, 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)

## 2.4 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



## SECTION 3

### 3. 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.

#### 3.1 How is information collected?

- |   |   |
|---|---|
| <input 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) |   |

#### 3.2 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)

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)

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

- |  |  |
|--|--|
| <input type="checkbox"/> Fibre optic   | <input type="checkbox"/> Wireless (please specify below) |
| <input type="checkbox"/> Hard wired (apart from fibre optic, please specify) | <input type="checkbox"/> Broadband                       |
| <input type="checkbox"/> Other (please specify)                              |  |

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

### 3.4 Where will the information be collected from?

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

- Other (please specify)

### 3.5 From whom/what is the information collected?

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

### 3.6 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)

### 3.7 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)

### 3.8 How long is footage stored? (please state retention period)

### 3.9 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)

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

- |   |  |
|---|--|
| <input type="checkbox"/> Statutory prosecution agencies | <input type="checkbox"/> Local Government agencies |
| <input type="checkbox"/> Judicial system                | <input type="checkbox"/> Legal representatives     |
| <input type="checkbox"/> Data subjects                  | <input type="checkbox"/> Other (please specify)    |

### 3.11 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)

**3.12 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)

**3.13 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)

**3.14 Do CCTV operators receive ongoing training?**

Yes       No

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

Yes       No

## SECTION 4

### 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.

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

##### Internal Consultations

- |  |   |
|--|---|
| <input type="checkbox"/> Data Protection officer         | <input 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 type="checkbox"/> Research, analysts and statisticians         |
| <input type="checkbox"/> Senior management               | <input 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 type="checkbox"/> Neighbourhood panels | <input type="checkbox"/> Other (please specify)   |

#### 4.2 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)

Is feedback available to view?

- Yes       No

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





