



**SURVEILLANCE CAMERA
COMMISSIONER**

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Information Commissioner's Office

Data protection impact assessments template for carrying out a data protection impact assessment on surveillance camera systems



Project name: North Devon Council Public Space CCTV

Data controller(s): North Devon District Council

This DPIA template should be completed with reference to the guidance provided by the Surveillance Camera Commissioner and the ICO. It will help you to identify whether the use of surveillance cameras is appropriate for the problem you wish to address, assess the risks attached to your project and form a record of your decision making.

1. Identify why your deployment of surveillance cameras requires a DPIA¹:

- | | |
|---|---|
| <input type="checkbox"/> Systematic & extensive profiling | <input type="checkbox"/> Large scale use of sensitive data |
| <input checked="" type="checkbox"/> Public monitoring | <input type="checkbox"/> Innovative technology |
| <input type="checkbox"/> Denial of service | <input type="checkbox"/> Biometrics |
| <input type="checkbox"/> Data matching | <input type="checkbox"/> Invisible processing |
| <input type="checkbox"/> Tracking | <input type="checkbox"/> Targeting children / vulnerable adults |
| <input type="checkbox"/> Risk of harm | <input type="checkbox"/> Special category / criminal offence data |
| <input type="checkbox"/> Automated decision-making | <input type="checkbox"/> Other (please specify) |

2. What are the timescales and status of your surveillance camera deployment? Is this a proposal for a new deployment, or the expansion of an existing surveillance camera system? Which data protection regime will you be processing under (i.e. DPA 2018 or the GDPR)?

Expansion of current system including additional cameras for Barnstaple Town Centre to include Green Lanes cameras and the addition of South Molton into the North Devon Council CCTV hub

Describe the processing

3. Where do you need to use a surveillance camera system and what are you trying to achieve?

Set out the **context** and **purposes** of the proposed surveillance cameras or the reasons for expanding an existing system. Provide evidence, where possible, including for example: crime statistics over an appropriate time period; housing and community issues, etc.

Barnstaple Town Centre Ilfracombe High Street and South Molton Town Centre

- Assist in the detection and prevention of crime, along with the maintenance of public order by providing evidence.
- Facilitate the apprehension and prosecution of offenders in relation to crime and public order Reduce public disorder and anti social behaviour and enhance the general public's perception of safety.
- Assist in the tracking and apprehension of persons who are suspected of committing a criminal offence.
- Assist in the identification of witnesses.
- Provide the Police and the Council with evidence to take criminal and civil action in the courts .

¹ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/>

- Deterring anti-social behaviour and assist in the detection of anti-social behaviour incidents
- Reducing the fear of crime and anti-social behaviour
- Assisting the emergency services in the location of missing vulnerable persons
- Improving the safety and security of residents, visitors and the business community who use the facilities covered by the CCTV scheme.
- Maintain and enhance the commercial viability of the District and encourage continued investment.
- Improving the safety and security of residents, visitors and the business community who use the facilities covered by the CCTV scheme.

Green Lanes Shopping Centre

In addition to the above the CCTV is also used for asset management and protection of Tenants property

4. Whose personal data will you be processing, and over what area? Set out the **nature** and **scope** of the personal data you will be processing. Who are the data subjects, and what kind of information will you be collecting about them? Do they include children or vulnerable groups, and what is the scale and duration of the processing?

North Devon Council will be recording the activities of residents and visitors to Barnstaple Town centre South Molton Town Centre and Ilfracombe High Street including the play areas of Rock Park (therefore the images of children will be captured), the Green Lanes Shopping centre and the adjacent industrial and retail parks at Seven Brethren and Anchor Woods Retail park. Recording will be 24 hrs/365 days

5. Who will be making decisions about the uses of the system and which other parties are likely to be involved? Will you be the sole user of the data being processed or will you be sharing it with other organisations or agencies? Record any other parties you would disclose the data to, for what purposes, and any relevant data sharing agreements. Note that if you are processing for more than one purpose you may need to conduct separate DPIAs.

North Devon Council are the sole user of the CCTV system. North Devon Council is the Data Controller at the point of images being recorded, however, if any images are released to any of the authorised organisations, then the legal responsibility will be transferred to that organisation in relation to the images that have been released. Information is only shared with the police where they have a justifiable need to view the CCTV images pursuant to the prevention or detection of crime and/or the prosecution or apprehension of offenders under the Criminal Procedure and investigations act 1996.

6. How is information collected? (tick multiple options if necessary)

- Fixed CCTV (networked)
- ANPR
- Stand-alone cameras
- Other (please specify)
- Body Worn Video
- Unmanned aerial systems (drones)
- Redeployable CCTV

7. Set out the information flow, from initial capture to eventual destruction. You may want to insert or attach a diagram. Indicate whether it will include audio data; the form of transmission; the presence of live monitoring or use of watchlists; whether data will be recorded; whether any integrated surveillance technologies such as automatic facial recognition are used; if there is auto deletion after the retention period. You may have additional points to add that affect the assessment.

Barnstaple Town Centre, Ilfracombe and South Molton Town Centre
The Video footage is captured by a HD IP cameras encoded and transmitted wireless to the VMS (Video Management System) hosting server that is password protected and is situated within the CCTV control room of North Devon Council. No analytical hardware or software is used in conjunction with the North Devon Council Public Space CCTV cameras.

The stored footage has a retention period of 28 days which is believed to be the maximum amount of time allowable in which we are likely to have heard about any investigations being conducted by the police following a crime complaint from the public, after which the VMS automatically overwrites the footage thus deleting it. If the footage is deemed to be of evidential value this can be quarantined by CCTV Operators for a maximum period of 90 days from the date of initial recording. This is deemed by the Council to be sufficient time for Enforcement Officers (Including the Police) to carry out their investigations diligently. All quarantined footage will be deleted unconditionally after 90 days from initial recording by the CCTV, the only exception is if there is a serious crime such as a murder or terrorist attack whereby the retention period will be decided by the CCTV manager. Once any quarantined footage has been disclosed to Enforcement Officers (Including the Police), it will be deleted as part of the disclosure process.

Green Lanes shopping centre
The Video footage is captured by CCTV cameras which are connected directly to a HVR (Hybrid Video Recorder) that is password protected and is situated within the CCTV control room of the Gren lanes Shopping Centre.

The stored footage has a retention period of 28 days which is believed to be the maximum amount of time allowable in which we are likely to have heard about any investigations being conducted by the police following a crime complaint from the public, after which the HVR automatically overwrites the footage thus deleting it. If the footage is deemed to be of evidential value this can be quarantined by CCTV Operators for a maximum period of 90 days from the date of initial recording. This is deemed by the Council to be sufficient time for Enforcement Officers (Including the Police) to carry out their investigations diligently. All quarantined footage will be deleted unconditionally after 90 days from initial recording by the CCTV, the only exception is if there is a serious crime such as a murder or terrorist attack whereby the retention period will be decided by the CCTV manager. Once any quarantined footage has been disclosed to Enforcement Officers (Including the Police), it will be deleted as part of the disclosure process.

General

The stated purposes and the data retention periods of North Devon Council Public Space CCTV system can be found in the North Devon Council CCTV procedures manual. CCTV Operations Policy.

Procedures for the release of data for enforcement purposes can be found in the North Devon Council CCTV Procedures Manual..

8. Does the system's technology enable recording?

Yes No

If recording is enabled, state where it is undertaken (no need to stipulate address, just Local Authority CCTV Control room or on-site will suffice for stand-alone camera or BWV), and whether it also enables audio recording.

Barnstaple Town centre, Ilfracombe and South Molton
North Devon Council CCTV control room.

Green lanes Shopping Centre
Green Lanes CCTV Control Room
there is no audio recording.

9. If data is being disclosed, how will this be done?

- Only by on-site visiting
 Copies of footage released (detail method below, e.g. encrypted digital media, via courier, etc)
 Off-site from remote server
 Other (please specify)

Police will access data on site. Subject Access requests, requests from Insurance companies and solicitors will be dealt with again by on site visits whereby ID verification and signatures will be needed to release the data.

10. How is the information used? (tick multiple options if necessary)

- Monitored in real time to detect and respond to unlawful activities
- Monitored in real time to track suspicious persons/activity
- Compared with reference data of persons of interest through processing of biometric data, such as facial recognition.
- Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software
- Linked to sensor technology
- Used to search for vulnerable persons
- Used to search for wanted persons
- Recorded data disclosed to authorised agencies to support post incident investigation, including law enforcement agencies
- Recorded data disclosed to authorised agencies to provide intelligence
- Other (please specify)

Released to council departments investigating Anti Social Behaviour (ASB) licensing and fly tipping.

Consultation

11. Record the stakeholders and data subjects you have consulted about the deployment, together with the outcomes of your engagement.

Stakeholder consulted	Consultation method	Views raised	Measures taken
Devon and Cornwall Police	email, meetings	Continuing high levels of crime and anti-social behaviour and effectiveness of existing camera system. Expansion must take into account areas of vulnerability regarding violence against women	Expansion of current CCTV system. Improved liason between CCTV and Devon and Cornwall police to effectively combat anti-social behaviour
North Devon Council members	Committee reports	Review concluded that the CCTV service is highly valued both within the organisation and by external stakeholders	Continued support for CCTV and for the expansion to cover areas of regeneration currently taking place in Barnstaple Town Centre
Police Crime Comissioner	email, meetings	A CCTV hub located in Barnstaple that has the ability to monitor various towns from across the area would be beneficial to all	Continued to support
Barnstaple businesses	email, meetings	A comprehensive CCTV system in the town is essential for the safety of residents and visitors alike	Continued support
Public	online consultation	64% of respondents agreed with the provision of an upgraded CCTV system and 47% felt the provision had a direct impact on them.	Continued support

South Molton Council members	Committee reports	Review concluded that the CCTV service is highly valued both within the organisation and by external stakeholders	Requirement for a non operator monitored CCTV system in the immediate town centre for evidence gathering capabilities and to act as a deterrant. due to high levels of anti-social behaviour Only to be monitored live on special occasions as requested by South Molten Town Council
South Molton Businesses	email, meetings	Some CCTV for the town centre was thoughtr to be essential given the levels of anti-social behaviour	Support from Businesses to implement

Consider necessity and proportionality

12. What is your lawful basis for using the surveillance camera system? Explain the rationale for your chosen lawful basis under the relevant data protection legislation. Consider whether you will be processing special categories of data.

Article 6(1)(e) of the GDPR, which allows the Council to process personal data when this is necessary to perform its public tasks as a local authority - this is pursuant to local authority powers to provide closed circuit television in section 163 of the Criminal Justice and Public Order Act 1994.

On occasion CCTV may collect and the Council may process images which contain special category data, such as health or criminal offence information, the lawful basis we rely on to process it is article 9(2)(g) of the GDPR. This also relates to our public task and the safeguarding of your fundamental rights in accordance with section 163 of the Criminal Justice and Public Order Act 1994. And Schedule 1 part 2(6) of the Data Protection Act 2018 which relates to statutory and government purposes. Other than to temporarily store such information the Council will not process more sensitive information save where it is justifiably necessary pursuant to law enforcement or similar requirements where it will be required to share the information with the police or other third party organisation.

13. How will you inform people that they are under surveillance and ensure that they are provided with relevant information? State what privacy notices will be made available and your approach to making more detailed information available. Consider whether data subjects would reasonably expect to be under surveillance in this context.

The Council has:-

- Developed a CCTV Operations Policy that describes in detail who has responsibility and accountability for all Public Space surveillance camera system activities including images and information collected, held and used.
- Published the locations of its Public Space CCTV cameras including mobile cameras and other information relating to the Public Space CCTV system on its Corporate Website at the following address <https://www.northdevon.gov.uk/community-safety-and-emergencies/cctv/>
- A consistent CCTV signage policy. All areas where CCTV is in use will have clear, consistent signs exhibited to comply with the GDPR and Data Protection Act; this is to advise people that they are about to enter an area covered by CCTV cameras or to remind them that they are still in an area covered by CCTV. The signs will also act as an additional deterrent. CCTV signs will not be displayed in areas, which do not have CCTV cameras. Signs will carry the outline of a CCTV camera. The information on the sign will explain why the CCTV cameras are there, including who runs them (North Devon Council) and a contact number (01271 327711). The signs, position and the message will be large enough to enable people to easily read the information on it.
- Recognises that individuals whose information is recorded have a right to be provided with that information or, if they consent to it, view that information. Requests will be dealt with promptly. It should be noted that Individuals will only have 28 days to make a request before the footage is automatically deleted. All requests are subject to operational considerations for example where;
 - Footage has been requested by and/or passed to the Police as part of an investigation of a crime; or

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- Footage has been requested in respect of a road traffic collision and the information has been passed to insurers; or
 - Any relevant exemptions that might be considered to apply in respect of the Data Protection Act 2018.
- A Corporate complaints procedure that can be used for any complaints received regarding CCTV operations. Anyone wishing to make comments or observations about the CCTV system should write or email the CCTV Manager whose contact details can be found in the Public Space CCTV Policy.

All of the above is contained on North Devon Councils Website
<https://www.northdevon.gov.uk/community-safety-and-emergencies/cctv/> or by telephoning 01271 327711.

14. How will you ensure that the surveillance is limited to its lawful purposes and the minimum data that is necessary for those purposes? Explain the adequacy and relevance of the data you will be processing and how it is limited to the purposes for which the surveillance camera system will be deployed. How will you know if it is delivering the benefits it has been deployed for?

All operators will be fully trained and Security Industry Authority (SIA) accredited which is required by North Devon Council to ensure all operators are fully trained to a recognised national standard. Data will only be held for 28 days and then automatically deleted except for footage required for post crime investigation, criminal prosecution or other related reasons. A yearly review of the CCTV camera system will audit the effectiveness and proportionality of the CCTV system to assess whether it is delivering results. This review is published on the North Devon Council website.

15. How long is data stored? (please state and explain the retention period)

Data is stored for a period of 28 days, which is believed to be the maximum amount of time allowable in which we are likely to have heard about any investigations being conducted by the police following a crime complaint from the public, after which it is automatically deleted by being overwritten by the Video Management System.

16. Retention Procedure

- Data 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)

Upon request by Devon and Cornwall police the operator will review the footage and if the footage is deemed to be of evidential value it will be quarantined by CCTV Operators for a maximum period of 90 days from the date of initial recording. The footage burnt to DVD and placed in an evidence bag and handed to an authorised police officer visiting the CCTV control room who signs for the evidence acknowledging that they are now responsible for protecting the data

17. How will you ensure the security and integrity of the data? How is the data processed in a manner that ensures appropriate security, protection against unauthorised or unlawful processing and against accidental loss, destruction or damage? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Barnstaple Town Centre, Ilfracombe and South Molton
All video footage from the CCTV system is recorded on the Video Management System located within the CCTV control room which is password protected. Only CCTV operators have access to recorded footage and are able to access that footage. All video footage recorded for evidential useage is entered in the CCTV digital audit log. Only authorised persons are allowed into the CCTV control room and all video footage awaiting collection is stored in locked storage cupboard which is located within the CCTV control room.

Grren Lanes

As above but all video footage from the Green Lanes CCTV system is recoreded on a Hybrid Video Recorder located in the Green Lanes CCTV control room and which is password protected.

18. How will you respond to any subject access requests, the exercise of any other rights of data subjects, complaints or requests for information? Explain how you will provide for relevant data subject rights conferred under the legislation. You must have procedures in place to respond to requests for camera footage in which a subject appears, and to respond to any other request to meet data protection rights and obligations.

Requests for access or the exercise of other rights by data subjects are referred to the data protection team to log and process. Forms are available on the Council's central privacy notice on its website (www.northdevon.gov.uk/privacy) which can be completed and emailed or passed in paper copy to the Council's reception desk. The data protection team contact the CCTV office who will review footage to see if the requested personal data is held. This can be quaratined if it has been requested and made available or burnt onto a disc for the data subject to view. Simiarly footage can be manually deleted and/or redacted where necessary.

19. What other less intrusive solutions have been considered? You need to consider other options prior to any decision to use surveillance camera systems. For example, could better lighting or improved physical security measures adequately mitigate the risk? Does the camera operation need to be continuous? Where you have considered alternative approaches, provide your reasons for not relying on them and opting to use surveillance cameras as specified.

There is a general consensus that other solutions could be effective, such as erecting security fencing or improved lighting. However security fencing is impracticable for a public space such as Barnstaple Town Centre and street lighting is the responsibility of Devon County Council and as such North Devon Council only has a limited say in its implementation. For our town centre area CCTV is the best possible solution and works hand in hand with improved street lighting and street marshalling. CCTV evidence is also becoming increasingly important in the prosecution of offenders. We do inform members of the public that CCTV is in use by installing signs detailing the scheme and its purpose, along with a contact telephone number.

Grren Lanes also has their own Security personel on site who are able to show a presence to limit the impact of criminal and anti-social behaviour on site

20. Is there a written policy specifying the following? (tick multiple boxes if applicable)

- The agencies that are granted access
- How information is disclosed
- How information is handled

Are these procedures made public? Yes No

Are there auditing mechanisms? Yes No

If so, please specify what is audited and how often (e.g. disclosure, production, accessed, handled, received, stored information)

All requests for CCTV reviewing are recorded and any data disclosed is recorded in the CCTV audit trail log including who requested the footage and when, brief details of the footage requested including which cameras were recorded. How the footage was produced and when. A signature is required on the individual audit sheet for every evidential recording produced when a police officer or other authorised agency or person (in the case of Subject Access requests) Receives the video footage

Identify the risks

Identify and evaluate the inherent risks to the rights and freedoms of individuals relating to this surveillance camera system. Consider, for example, how long will recordings be retained? Will they be shared? What are the expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective? Could it interfere with other human rights and freedoms such as those of conscience and religion, expression or association. Is there a risk of function creep? Assess both the likelihood and the severity of any impact on individuals.

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Operator error Accidental or intentional misuse of Cameras may intrude upon individuals privacy and so breaching the Human Rights act and GDPR/DPA 2018	Remote, possible or probable Possible	Minimal, significant or severe Significant	Low, medium or high
Security of Data A security Data breach may result in an individuals privacy being compromised and/or their identity and actions disclosed	Possible	Significant	
Misuse of Data or unauthorised disclosure may result in an individuals privacy being compromised and/or their identity and actions disclosed thus breaching their Human Rights and Data protection rights	Possible	Severe	
Collecting Excessive data - Unattended cameras left positioned in such a way that collects more identifiable data than is required for the task in hand	Possible	Significant	

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Covert surveillance - use of cameras where Police operations require the use of CCTV will impact on a persons privacy and breach their Human rights and Data Protections	Remote, possible or probable Possible	Minimal, significant or severe Significant	Low, medium or high
Non Compliance of GDPR/DPA 2018 which may result in a breach of a persons privacy	Possible	Significant	
Failure to observe the Human Rights Act in particular Article 8 A breach of any article may impede on a subject's rights	Possible	Significant	

Address the risks

Explain how the effects of privacy enhancing techniques and other features mitigate the risks you have identified. For example, have you considered earlier deletion of data or data minimisation processes, has consideration been given to the use of technical measures to limit the acquisition of images, such as privacy masking on cameras that overlook residential properties? What security features, safeguards and training will be in place to reduce any risks to data subjects. Make an assessment of residual levels of risk.

Note that APPENDIX ONE allows you to record mitigations and safeguards particular to specific camera locations and functionality.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk			
Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
<p>Operator Error</p> <p>All Operators are SIA trained to a national standard and are required to read and sign both North Devon Councils CCTV code of practices and the Surveillance Camera Commissioners code of practice. Yearly appraisals of operators work is conducted and ongoing training as and when new legislative and operational changes take place. Regular checks on CCTV coverage undertaken. Privacy masking of residential properties on the cameras to mitigate intrusion</p>	<p>Eliminated reduced accepted reduced</p>	<p>Low medium high low</p>	<p>Yes/no</p>
<p>Security of Data</p> <p>All recorded transmissions from camera to the CCTV control room are encrypted. Access to the control room is electronically secured with only authorised personnel able to enter unescorted. The Video management System and Evidence locker are password protected. All CCTV user logs and other records are electronically entered into a password secured site within North Devon Council. Regular audits are carried out and system checks carried out by maintenance contractors for network security</p>	<p>reduced</p>	<p>low</p>	

<p>Misuse or Disclosure of data</p> <p>All reviews of CCTV footage must be accompanied with the appropriate authorisation such as a subject access request reference number or police crime number and a CCTV audit trail is then logged to show the journey of the review and its outcome. All footage disclosed must be accompanied by the signatures of the operator disclosing and the recipient. All parties who use data from the system are aware of their obligations under GDPR/DPA. CCTV staff are trained in unauthorised disclosure and misuse of data</p>	reduced	low	
<p>Options to reduce or eliminate risk</p>	<p>Effect on risk</p>	<p>Residual risk</p>	<p>Measure approved?</p>
<p>Collecting Excessive data</p> <p>All cameras have set home positions and tours so that when an operator is no longer using a particular camera it is timed to either return to its home position or preset tour. All operators of the CCTV system are regularly trained in appropriate pro active CCTV techniques</p>	<p>Eliminated reduced accepted reduced</p>	<p>Low medium high low</p>	<p>Yes/no</p>
<p>Covert Surveillance</p> <p>All covert surveillance is accompanied by an authorising notice (RIPA 2000) which sets out the reasons for and details of the surveillance. The RIPA is checked to ensure it meets its legislative requirements and has been signed by a Police Superintendent or above and is logged accordingly. An operator then monitors the police use of the CCTV to ensure the operation does not go outside the boundaries of the RIPA additionally all cameras are visible with appropriate signage and their locations identified on NDC website</p>	reduced	low	

<p>Compliance with GDPR/DPA 2018</p> <p>Management of the system including monitoring, reviewing and downloading of footage, Regular audits and periodic training for all CCTV staff</p>	<p>reduced</p>	<p>low</p>	
<p>Compliance with the Human Rights Act</p> <p>Management of the system including monitoring, reviewing and downloading of footage, Regular audits and periodic training for all CCTV staff</p>	<p>reduced</p>	<p>low</p>	

Authorisation

If you have not been able to mitigate the risk then you will need to submit the DPIA to the ICO for prior consultation. [Further information](#) is on the ICO website.

Item	Name/date	Notes
Measures approved by: Town Centre Manager		Integrate actions back into project plan, with date and responsibility for completion.
Residual risks approved by: Town Centre Manager		If you identify a high risk that you cannot mitigate adequately, you must consult the ICO before starting to capture and process images.
DPO advice provided by:		DPO should advise on compliance and whether processing can proceed.
Summary of DPO advice		
DPO advice accepted or overruled by: (specify role/title)		If overruled, you must explain your reasons.
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons.
Comments:		

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This DPIA will be kept under review by: CCTV control room senior operator		The DPO should also review ongoing compliance with DPIA.
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APPENDIX ONE

This template will help you to record the location and scope of your surveillance camera system and the steps you've taken to mitigate risks particular to each location.

Location: Each system operator/owner should list and categorise the different areas covered by surveillance on their system. Examples are provided below.

Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
Barnstaple Town Centre	PTZ HD Fixed	27 4	24hrs	24hrs (only maximum 3 operators) – likely average patrol high hourly	The privacy level expectation in a town centre is very low; our town centres are well signed with appropriate signage for CCTV its use and purpose with contact details. Where there is residential properties such as flats above shops used for residency then privacy masking is used
Public car park	PTZ HD	6	24hrs	24hrs (only maximum 3 operators) – likely average patrol high hourly	The privacy level expectation in a town centre car park is very low; our car parks are well signed with appropriate signage for CCTV its use and purpose with contact details. Where there is residential properties such as flats above shops used for residency then privacy masking is used
Parks and play areas	PTZ HD FIXED HD	3 3	24hrs	24hrs (only maximum 3 operators) – likely average patrol high hourly	Used for child safety and to reduce anti-social behaviour. The privacy level expectation is very low although where there are residential properties then privacy masking is used. Areas are signed with appropriate signage for CCTV its use and purpose with contact details.
shopping and industrial retail par	PTZ HD	5	24hrs	24hrs (only maximum 3 operators) – likely average patrol high hourly	The privacy level expectation here is very low, well signed with appropriate signage for

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Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
					CCTV its use and purpose with contact details.
Housing blocks internal	PTZ	1	24hrs	24hrs (only maximum 3 operators) – likely average patrol high hourly	High Level of privacy risk mitigated through use of privacy masks
Deployable CCTV	PTZ HD	1	24hrs when operational	24hrs when operational likely average patrol high hourly	Dependent on the location of deployment the privacy level can range from low to medium. Any deployment includes privacy zones programming of areas of privacy such as residential properties. All CCTV deployment will ensure the SCC 12 steps are met and maximum deployment is 4 weeks with a review before extending
Ilfracombe High Street	PTZ HD	1	24 hrs	24hrs (only maximum 3 operators) – likely average patrol high hourly	The privacy level expectation in a town centre is very low; our town centres are well signed with appropriate signage for CCTV its use and purpose with contact details. Where there is residential properties such as flats above shops used for residency then privacy masking is used
South Molton Town Centre	FIXED HD	6	24hrs	Only on special occasions as required by South Molton Town Council	The privacy level expectation in a town centre is very low; our town centres are well signed with appropriate signage for CCTV its use and purpose with contact details. Where there is residential properties such as flats above shops used for residency then privacy masking is used
Greenlanes Shopping Centre					

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Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
Internal Public Spaces	PTZ	8	24hrs	During opening Hours	The privacy level expectation is extremely low; it is well signed with appropriate signage for CCTV its use and purpose with contact details.
	Fixed	6			
External Cameras	PTZ	5	24hrs	During opening Hours by green lanes operators during non operating hours by North Devon Council CCTV operators	The privacy level expectation is very low and is well signed with appropriate signage for CCTV its use and purpose with contact details. Where there is residential properties such as flats above shops used for residency then privacy masking is used
Car Parking area	PTZ	12	24hrs	During opening Hours	The privacy level expectation extremely low with appropriate signage for CCTV its use and purpose with contact details.
	Fixed	3			

APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

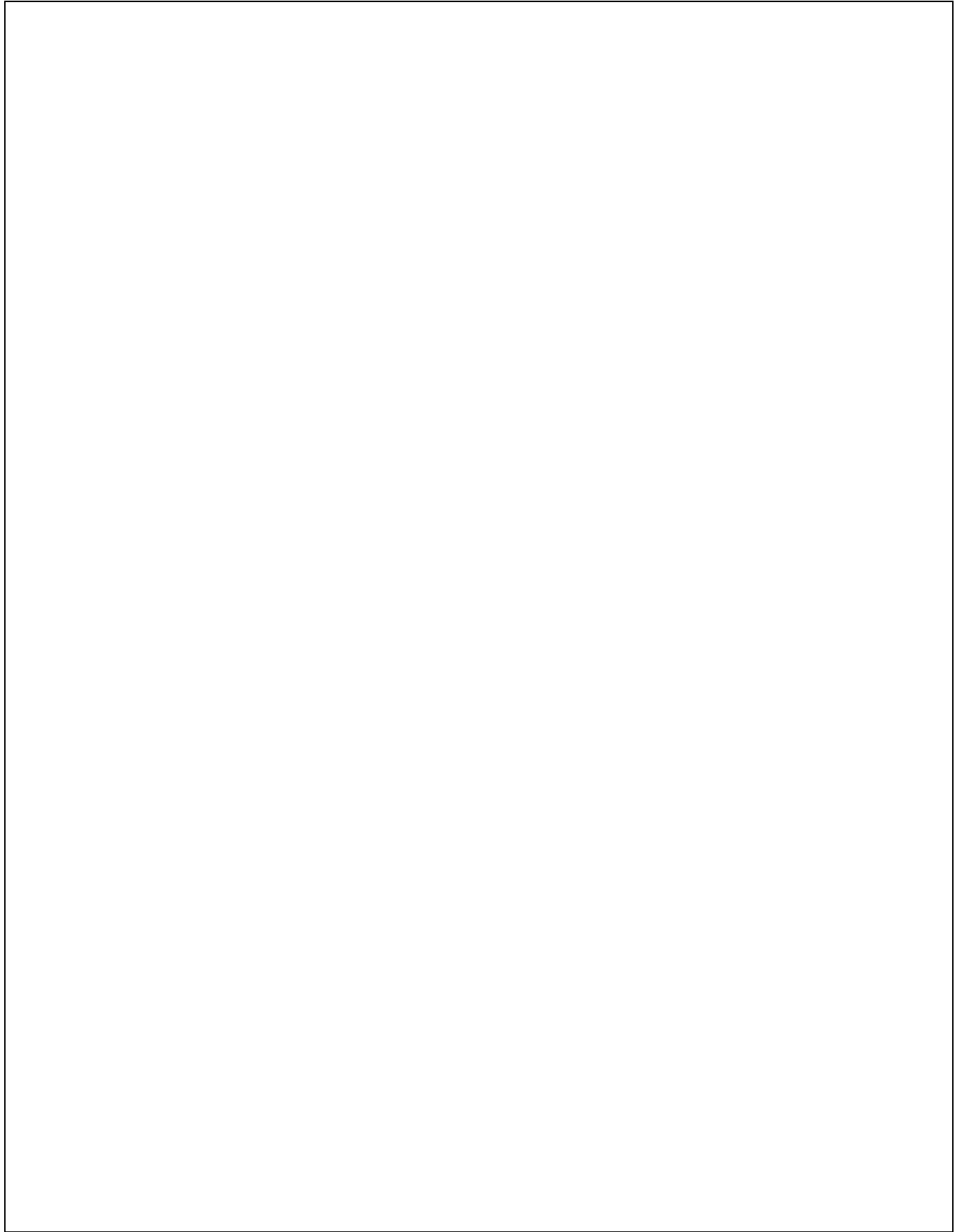
Use this risk matrix to determine your score. This will highlight the risk factors associated with each site or functionality.

Matrix Example:

	Camera Types (low number low impact – High number, High Impact)									
	→									
Location										
Types										
A (low impact)										
Z (high impact)										

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