



CCTV Policy

Adopted	May 2019
Reviewed	March 2024
Next review date	Ongoing

Notes:

1. The CCTV equipment provided by Somersham Parish Council is located at:
 - The Norwood Building / The Victory Hall, Parkhall Road
 - The Millennium Pavilion, The Trundle
 - The Public Shelter, The Cross
2. In order for the Parish Council to comply with the Data Protection Act 2018, General Data Protection Regulation (GDPR) and act in accordance with the Information Commissioners CCTV Code of Practice the Parish Council requires a policy.
3. The Policy below has been drafted in accordance with the:
 - a) Data Protection Act 2018.
 - b) Information Commissioners CCTV Code of Practice (2008)
 - c) The Home office 'Surveillance Camera Code of Practice' June 2013
 - d) Freedom of Information Act 2000.
 - e) GDPR

<https://ico.org.uk/for-organisations/guide-to-data-protection-1998/encryption/scenarios/cctv/>

<https://ico.org.uk/for-organisations/sme-web-hub/checklists/data-protection-self-assessment/cctv-checklist-report/>

Somersham Parish Council

CCTV Policy

1 Introduction

- 1.1 This policy is to control the management, operation, use and confidentiality of all CCTV systems as listed above.
- 1.2 It has been prepared taking due account of the Revised Code of Practice published by the Data Protection Commissioner (2018).
- 1.3 This policy will be subject to periodic review by the Parish Council to ensure that it continues to reflect the public interest and that the system meets legislative requirements.

2. Objectives of the scheme

- (a) To protect the buildings and assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To protect members of the public and private property
- (f) To assist in managing the community facilities

3. Statement of intent

- 3.1 The CCTV Schemes are registered with the Information Commissioner under the terms of the Data Protection Act 2018 and seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.
- 3.2 The Parish Council will treat the systems and all information, documents and recordings obtained and used as data which are protected by the Act.
- 3.3 Cameras will be used to monitor activities within the named facilities and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of staff and visitors.
- 3.4. Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

- 3.5 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Parish Councils forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.
- 3.6 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.
- 3.7 The planning and design has endeavoured to ensure that the CCTV systems will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- 3.8 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the CCTV.

4 Operation of the system

- 4.1 The Scheme will be administered and managed by the Executive Officer, in accordance with the principles and objectives expressed in the code.
- 4.2 The day-to-day management will be the responsibility of the Executive Officer.
- 4.3 The CCTV systems will operate 24 hours each day, every day of the year.

5. Control Room

- 5.1 The Executive Officer (and the Millennium Sports Facility Caretaker as appropriate) will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.
- 5.2 Access to the CCTV Control Room will be strictly limited to the Executive Officer (and the Millennium Sports Facility Caretaker as appropriate).
- 5.3 Unless an immediate response to events is required, CCTV Control Room(s) staff must not direct cameras at an individual or a specific group of individuals.

- 5.4 Visitors and other contractors wishing to enter the Control Room will be subject to particular arrangement as outlined below.
- 5.5 If out of hours emergency maintenance arises, the Executive Officer (and the Millennium Sports Facility Caretaker as appropriate) must be satisfied of the identity and purpose of contractors before allowing entry.
- 5.6 A visitor's book will be maintained in the Control Rooms. Full details of visitors including time/data of entry and exit will be recorded.
- 5.7 Other administrative functions will include maintaining the system (for the engineer to maintain and repair), filing and maintaining occurrence and system maintenance logs.
- 5.8 Emergency procedures will be used in appropriate cases to call the Emergency Services.

6. Liaison

- 6.1 Liaison meetings may be held with all bodies involved in the support of the system.

7. Monitoring procedures

- 7.1 Camera surveillance may be maintained at all times.
- 7.2. A monitor is installed in the Control Rooms to which pictures will be continuously recorded.
- 7.3 If covert surveillance is planned or has taken place copies of the Authorisation Forms, including any Review, or Cancellation must be returned to the Executive Officer.

8. Digital Recording

- 8.1 Recordings may be viewed by the Police for the prevention and detection of crime, authorised officers of Somersham Parish Council for supervisory purposes, authorised demonstration and training.

- 8.2 A record will be maintained of the release of digital recordings to the Police or other authorised applicants. A register will be available for this purpose.
- 8.3 Viewing of digital recordings by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 2018. However, the retention period for data is stored for twenty-eight days after which point the data automatically deletes and overwrites.
- 8.4 Should recordings be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code. Recordings will only be released to the Police on the clear understanding that the recording remains the property of the Parish Council, and both the recording and information contained on it are to be treated in accordance with this code. The Parish Council also retains the right to refuse permission for the Police to pass to any other person the recording or any part of the information contained thereon. On occasions when a Court requires the release of an original recording this will be produced and documented.
- 8.5 The Police may require the Parish Council to retain the stored digital recording for possible use as evidence in the future. Such recordings will be properly indexed and properly and securely stored until they are needed by the Police.
- 8.6 Applications received from outside bodies (e.g. solicitors) to view or release digital recordings will be referred to the Executive Officer. In these circumstances recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

9 Breaches of the code (including breaches of security)

- 9.1 Any breach of the Code of Practice by council staff, will be initially investigated by the Executive Officer, in order for him/her to take the appropriate disciplinary action.
- 9.2 Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

10 Assessment of the scheme and code of practice

- 10.1 Performance monitoring, including random operating checks, may be carried out by the Executive Officer or Millennium Sports Facility Caretaker.

11 Complaints

- 11.1 Any complaints about the Parish Council's CCTV system should be addressed to the Executive Officer.
- 11.2 Complaints will be investigated in accordance with Section 9 of this Code.

12 Access by the Data Subject

- 12.1 The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.
- 12.2 Requests for Data Subject Access should be made on an application form available from the Executive Officer.

13 Public information

Copies of this Code of Practice will be available to the public from the Executive Officer.

Summary of Key Points

- This Code of Practice will be reviewed every two years.
- The CCTV systems are owned and operated by Somersham Parish Council.
- The Control rooms will not be manned.
- The retention period for data is stored for twenty-eight days after which point the data automatically deletes and overwrites.
- Liaison meetings may be held with the Police and other bodies.
- Digital recording will properly indexed, stored and destroyed after appropriate use.
- Digital recording may only be viewed by Authorised Parish Council Officers, and the Police.
- Digital recording required as evidence will be properly recorded witnessed and stored on a USB/recorded as appropriate before copies are released to the police.
- Digital recording will not be made available to the media for commercial or entertainment.
- Digital recording will be disposed of securely once automatically wiped and overwritten.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the corporate policies and procedures. The Parish Council must use these procedures and comply with the requirements set out in the procedure documentation.

- Any breaches of this code will be investigated by the Executive Officer. An independent investigation will be carried out for serious breaches.
- Breaches of the code and remedies will be reported to the Parish Council.

THIS POLICY MUST BE COMPLIED WITH AT ALL TIMES.

I have read the above policy and agree to abide by these instructions. I will discuss any concerns with the Executive Officer to the Council at any time.

Signed Print Name

Date/...../.....

(Operators are issued with their own copy of this policy and shall sign to confirm receipt and compliance.)

DPIA Somersham CCTV

By completing this document, the organisation is documenting for a particular system both the 'why' and 'how' processing of personal data is being undertaken, the risks identified (pertaining to the rights and freedoms of affected data subjects), and whether any mitigating safeguards either address those risks or the risks are accepted, including any outstanding actions such as consultation with data subjects.

DPIA prepared by	Business Function	Date
Irene Healiss	Monitoring – Fixed CCTV (networked.)	

Step 1: Identify the need for a DPIA

Summary of processing					
Explain broadly what the system and its associated processing of personal data aims to achieve and what types of processing it involves. Refer or link to other documents, such as a legal entity and personal data flow diagrams to answer the following questions that provide evidence that a DPIA was determined as being required (or not):					
Ref	Question	Low risk indicators	Medium risk indicators	High risk indicators	L/M/H
1	Category of personal data involved	Passes necessity test	Personal data that may be used for multiple purposes	Personal data that needs to be treated more sensitively	
2	Legal basis for the main purpose	Consent / legal obligation / vital interests	Public interest / contract	Legitimate interest / none	
3	To what degree will processing raise privacy concerns	Reasonably expected	Profiling of behavioural patterns / unexpected communications	Vulnerable data subjects / more private personal data (HR, etc) / multiple processing entities	
4	Provision of personal data	Legal obligation / other sources have consent	Aware but have choice and rights / indirect but aware	Compelled (not legal obligation) / unaware	
5	Volumes and type of processing	<20% database, data subjects or	Combining data / 20-50% database, data subjects or users / scheduled	Large scale / frequent / irregular	

		users / simple set			
6	Continuous improvement of processes, technology or organisation design and development	Maintenance upgrades / fixes	Change in processing / functional upgrades / new sub-processor	Unproven innovations / new purposes / new legal entities / no governance	
7	Decision making	Non-digital profiling	Profiling (human involvement) / making assumptions or scoring (creating new personal data)	Automated decision-making, including profiling such as tracking or monitoring	
8	Disclosure	Legal obligation / within EEA	Ex-EEA but covered by BCRs, SCCs, adequacy decision (or Privacy Shield)	Ex-EEA but safeguarding measures not sure or unclear	
9	Risk management process followed re impact on data subjects	Reasonably expected life stresses	Minor social or financial dis-benefit	Known to be a high risk (standards or <u>guidance</u>) / not known / unlawful processing	

Note that 2 or more high risk indicators will require a DPIA (Step 2 onwards below).

Step 2: Processing description

Nature of the processing

There are nine (9) cameras currently located at the Norwood Building, which is a Council owned and maintained facility, including the car parking area and rear Norwood field which contains play equipment and a multi sports area.

There are ten cameras (10) at The Millennium Pavilion, which is also Parish Council owned and maintained.

There is one camera at 'The Cross' High Street Somersham, which is located in the centre of the village.

The purpose of our CCTV is to enable the Council to securely maintain its assets.

The cameras may also act as a crime deterrent and offer vital evidence when reporting crime (as and when is necessary,) as well as assisting the emergency services in the location of missing vulnerable persons. Also, when considering deterring anti-social behaviour and assisting in the detection of anti-social behaviour incidents.

Surveillance also offers an improvement to the safety and security of residents, visitors and the business community who use the facilities covered by the CCTV scheme.

The retention period for data is stored for twenty-eight days after which point the data automatically deletes and overwrites.

Scope of the processing:

It is expected that the Parish Council have regard to the Surveillance camera code of practice under section 33.5 of the Protection of Freedoms Act 2012 (which includes police services, police and crime commissioners, local authorities and parish and district councils)- it is of value to the wider community of a public authority who perform public functions operating surveillance cameras. All organisations in the UK must comply with data protection law.

Context of the processing:

Article 35 of the GDPR (general processing) and section 64 DPA 2018 (law enforcement processing) sets out what this DPIA must cover. There are further mandatory risks identified by the ICO as some processing is likely to high risk to individuals' rights and freedoms which the Parish Council must also consider.

Purposes of the processing:

When considering risk, the likelihood and severity of any impact to individuals must be duly considered and also address any statutory requirements under the Human Rights Act 1998. Therefore, in addition to a public body performing public functions, the Parish Council must ensure that the system complies with HRA requirements. Ongoing reviews must ensure that surveillance cameras remain justified and should factor a review of DPIA into ongoing risk assessment procedures to consider any significant changes to risk. Other less privacy-intrusive solutions should also be considered, such as improved lighting, fencing, gates, landscape. The Parish Council will consider these factors when processing the data.

Step 3: Consultation

Consulting relevant stakeholders

The principal authority (HDC) through, for example, highways officers, local law enforcement and Neighbourhood safety, the ASB team, environmental and enforcement teams are all considered as jointly interested parties, although the cost of the CCTV in Somersham is fully met by the Parish Council and installed/ maintained by a professional and competent company.

Step 4: Necessity and proportionality

Measures to address compliance and proportionality

When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.

Step 5: Assessment of potential risks and possible mitigations to reduce or manage adverse effects

Principle 1: lawfulness, fairness and transparency

Purpose of processing the personal data

- (a) To protect the buildings and assets
- (b) To increase personal safety and reduce the fear of crime
- (c) To support the Police in a bid to deter and detect crime
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To protect members of the public and private property
- (f) To assist in managing the community facilities

Description of the risk	<p>Breach of Privacy, unlawful use of CCTV</p> <p>When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.</p>
Rationale and consequences for data subjects	<p>Clear CCTV signage at all locations</p> <p>Of the 12 surveillance camera code of practice principles, Principle 2 (privacy) states that the use of surveillance camera systems must consider the effect on individuals and their privacy, with regular reviews to ensure its use remains justified.</p>
Existing controls that contribute to manage risks identified	<p>Cameras will be used to monitor activities within the named facilities and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of staff and visitors.</p> <p>Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.</p> <p>Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Parish Councils forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.</p> <p>Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.</p> <p>Ongoing CCTV review should tie in with SPC's current risk management processes (and assess changes to risk), as well as consider less intrusive alternatives to privacy, such as improved lighting, fencing, and landscaping. Surveillance should be proportionate and offer improvement for the safety and security of residents, visitors, and the business community.</p>
Likelihood = remote / possible / probable	

Severity = minimal / significant / severe Assessment of residual risk re current measures = low / medium / high	
Recommended additional actions to reduce or mitigate risk	
Effect on risk = eliminated / reduced / accepted Assessment of residual risk after mitigation = low / medium / high Measure Approved = yes / no	

Principle 2: purpose limitation	
Purpose of processing the personal data	<ul style="list-style-type: none"> (a) To protect the buildings and assets (b) To increase personal safety and reduce the fear of crime (c) To support the Police in a bid to deter and detect crime (d) To assist in identifying, apprehending and prosecuting offenders (e) To protect members of the public and private property (f) To assist in managing the community facilities
Description of the risk	<p>Breach of Privacy, unlawful use of CCTV</p> <p>When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.</p>
Rationale and consequences for data subjects	<p>Clear CCTV signage at all locations</p> <p>Of the 12 surveillance camera code of practice principles, Principle 2 (privacy) states that the use of surveillance camera systems must</p>

	<p>consider the effect on individuals and their privacy, with regular reviews to ensure its use remains justified.</p>
<p>Existing controls that contribute to manage risks identified</p>	<p>Cameras will be used to monitor activities within the named facilities and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of staff and visitors.</p> <p>Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.</p> <p>Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Parish Councils forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.</p> <p>Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.</p> <p>Ongoing CCTV review should tie in with SPC's current risk management processes (and assess changes to risk), as well as consider less intrusive alternatives to privacy, such as improved lighting, fencing, and landscaping. Surveillance should be proportionate and offer improvement for the safety and security of residents, visitors, and the business community.</p>
<p>Likelihood = remote / possible / probable</p> <p>Severity = minimal / significant / severe</p> <p>Assessment of residual risk re current measures = low / medium / high</p>	
<p>Recommended additional actions to reduce or mitigate risk</p>	
<p>Effect on risk = eliminated / reduced / accepted</p> <p>Assessment of residual risk after mitigation = low / medium / high</p>	

Measure Approved = yes / no	
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Principle 3: data minimisation	
Purpose of processing the personal data	<p>(a) To protect the buildings and assets</p> <p>(b) To increase personal safety and reduce the fear of crime</p> <p>(c) To support the Police in a bid to deter and detect crime</p> <p>(d) To assist in identifying, apprehending and prosecuting offenders</p> <p>(e) To protect members of the public and private property</p> <p>(f) To assist in managing the community facilities</p>
Description of the risk	<p>Breach of Privacy, unlawful use of CCTV</p> <p>When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.</p>
Rationale and consequences for data subjects	<p>Clear CCTV signage at all locations</p> <p>Of the 12 surveillance camera code of practice principles, Principle 2 (privacy) states that the use of surveillance camera systems must consider the effect on individuals and their privacy, with regular reviews to ensure its use remains justified.</p>
Existing controls that contribute to manage risks identified	<p>Cameras will be used to monitor activities within the named facilities and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of staff and visitors.</p> <p>Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.</p> <p>Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Parish Councils forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.</p>

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<p>Likelihood = remote / possible / probable</p> <p>Severity = minimal / significant / severe</p> <p>Assessment of residual risk re current measures = low / medium / high</p>	
<p>Recommended additional actions to reduce or mitigate risk</p>	
<p>Effect on risk = eliminated / reduced / accepted</p> <p>Assessment of residual risk after mitigation = low / medium / high</p> <p>Measure Approved = yes / no</p>	

Principle 4: accuracy	
<p>Purpose of processing the personal data</p>	<ul style="list-style-type: none"> (a) To protect the buildings and assets (b) To increase personal safety and reduce the fear of crime (c) To support the Police in a bid to deter and detect crime (d) To assist in identifying, apprehending and prosecuting offenders (e) To protect members of the public and private property (f) To assist in managing the community facilities
<p>Description of the risk</p>	<p>Breach of Privacy, unlawful use of CCTV</p>

	<p>When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.</p>
<p>Rationale and consequences for data subjects</p>	<p>Clear CCTV signage at all locations</p> <p>Of the 12 surveillance camera code of practice principles, Principle 2 (privacy) states that the use of surveillance camera systems must consider the effect on individuals and their privacy, with regular reviews to ensure its use remains justified.</p>
<p>Existing controls that contribute to manage risks identified</p>	<p>Cameras will be used to monitor activities within the named facilities and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of staff and visitors.</p> <p>Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.</p> <p>Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Parish Councils forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.</p> <p>Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.</p> <p>Ongoing CCTV review should tie in with SPC's current risk management processes (and assess changes to risk), as well as consider less intrusive alternatives to privacy, such as improved lighting, fencing, and landscaping. Surveillance should be proportionate and offer improvement for the safety and security of residents, visitors, and the business community.</p>
<p>Likelihood = remote / possible / probable</p> <p>Severity = minimal / significant / severe</p>	

Assessment of residual risk re current measures = low / medium / high	
Recommended additional actions to reduce or mitigate risk	
Effect on risk = eliminated / reduced / accepted Assessment of residual risk after mitigation = low / medium / high Measure Approved = yes / no	

Principle 5: storage limitation	
Purpose of processing the personal data	<ul style="list-style-type: none"> (a) To protect the buildings and assets (b) To increase personal safety and reduce the fear of crime (c) To support the Police in a bid to deter and detect crime (d) To assist in identifying, apprehending and prosecuting offenders (e) To protect members of the public and private property (f) To assist in managing the community facilities
Description of the risk	<p>Breach of Privacy, unlawful use of CCTV</p> <p>When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.</p>
Rationale and consequences for data subjects	<p>Clear CCTV signage at all locations</p> <p>Of the 12 surveillance camera code of practice principles, Principle 2 (privacy) states that the use of surveillance camera systems must consider the effect on individuals and their privacy, with regular reviews to ensure its use remains justified.</p>

<p>Existing controls that contribute to manage risks identified</p>	<p>Cameras will be used to monitor activities within the named facilities and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of staff and visitors.</p> <p>Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.</p> <p>Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Parish Councils forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.</p> <p>Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.</p> <p>Ongoing CCTV review should tie in with SPC's current risk management processes (and assess changes to risk), as well as consider less intrusive alternatives to privacy, such as improved lighting, fencing, and landscaping. Surveillance should be proportionate and offer improvement for the safety and security of residents, visitors, and the business community.</p>
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<p>Effect on risk = eliminated / reduced / accepted</p> <p>Assessment of residual risk after mitigation = low / medium / high</p> <p>Measure Approved = yes / no</p>	

Principle 6: integrity and confidentiality	
Purpose of processing the personal data	<p>(a) To protect the buildings and assets</p> <p>(b) To increase personal safety and reduce the fear of crime</p> <p>(c) To support the Police in a bid to deter and detect crime</p> <p>(d) To assist in identifying, apprehending and prosecuting offenders</p> <p>(e) To protect members of the public and private property</p> <p>(f) To assist in managing the community facilities</p>
Description of the risk	<p>Breach of Privacy, unlawful use of CCTV</p> <p>When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.</p>
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<p>Effect on risk = eliminated / reduced / accepted</p> <p>Assessment of residual risk after mitigation = low / medium / high</p> <p>Measure Approved = yes / no</p>	

Principle 7: accountability	
<p>Purpose of processing the personal data</p>	<p>(a) To protect the buildings and assets</p> <p>(b) To increase personal safety and reduce the fear of crime</p> <p>(c) To support the Police in a bid to deter and detect crime</p> <p>(d) To assist in identifying, apprehending and prosecuting offenders</p> <p>(e) To protect members of the public and private property</p> <p>(f) To assist in managing the community facilities</p>
<p>Description of the risk</p>	<p>Breach of Privacy, unlawful use of CCTV</p> <p>When considering risk, the likelihood and severity of any impact to individuals must be considered and address any statutory</p>

	<p>requirements under the Human Rights Act (HRA) 1998 - in addition to a public body performing public functions, SPC must ensure that the system complies with HRA requirements by ensuring the balance between the need for cameras in public places against a right to privacy has been duly measured.</p>
<p>Rationale and consequences for data subjects</p>	<p>Clear CCTV signage at all locations</p> <p>Of the 12 surveillance camera code of practice principles, Principle 2 (privacy) states that the use of surveillance camera systems must consider the effect on individuals and their privacy, with regular reviews to ensure its use remains justified.</p>
<p>Existing controls that contribute to manage risks identified</p>	<p>Cameras will be used to monitor activities within the named facilities and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of staff and visitors.</p> <p>Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.</p> <p>Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorisation being obtained using the Parish Councils forms for Directed Surveillance to take place, as set out in the Regulation of Investigatory Power Act 2000.</p> <p>Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Recordings will never be released to the media for purposes of entertainment.</p> <p>Ongoing CCTV review should tie in with SPC's current risk management processes (and assess changes to risk), as well as consider less intrusive alternatives to privacy, such as improved lighting, fencing, and landscaping. Surveillance should be proportionate and offer improvement for the safety and security of residents, visitors, and the business community.</p>
<p>Likelihood = remote / possible / probable</p> <p>Severity = minimal / significant / severe</p> <p>Assessment of residual risk re current measures = low / medium / high</p>	

Recommended additional actions to reduce or mitigate risk	
Effect on risk = eliminated / reduced / accepted Assessment of residual risk after mitigation = low / medium / high Measure Approved = yes / no	

Step 6: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		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:

This DPIA will be kept under review by:

The DPO should also review ongoing compliance with DPIA