

Name of project or task	Name and job title of person completing this form	PIA Reference
Town Centre CCTV System	Deborah Topping, Information Governance Manager	PIA0001

Privacy Impact Assessment

SECTION 1

Before completing this form you must decide if a Privacy Impact Assessment (PIA) is required. The following questions will assist in making this decision. Answering 'yes' to any of these questions is an indication that a PIA is required.

Question	Yes / No
Will the project or task involve the collection of new information about individuals?	Yes
Will the Project or task compel individuals to provide information about themselves?	Yes
Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	No
Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	No
Does the project or task involve you using new technology or cameras which might be perceived as being privacy intrusive? For example the use of facial recognition or positioning technology in a location where the expectation of privacy may be higher.	Yes
Will the project or task result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	Yes
Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be particularly private.	No
Will the project or task require you to contact individuals in ways which they may find intrusive?	No

SECTION 2

The following is the process recommended by the Information Commissioner's Office (ICO) in their code of practice.

Step One – Identify the need for a PIA

Explain what the project or task aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.

Key objectives of CCTV are:

- To improve the perception of the public in respect of the safety of the town centre.
- To help reduce the amount of crime, including vehicle crime and shoplifting.
- To help reduce the number and type of antisocial street activities, e.g. flyposting, begging, illegal street trading, vandalism, drunken behaviour.
- To support a better detection of crime in areas covered by CCTV cameras and provide evidential material for any subsequent prosecution in court.
- To assist in traffic management where appropriate (this excludes speed cameras).
- To assist the Council in its enforcement and regulatory functions within Blackpool.
- To improve general security within Council, both in terms of personal security and security of the



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buildings and assets.

- To improve general security in the main retail streets, both in terms of personal security and security of buildings and premises.
- To assist in making the town and town centre a more attractive place in which to work, shop and play.
- To assist with visitor economy e.g. lost children, the management of major events held within the town.
- To maintain the basic fundamentals of an individual's right to privacy, dress and reasonable behaviour.

Summarise why the need for a PIA was identified.

Images of individuals will be captured and recorded. These may be monitored in 'real-time'. Due to the nature of the task – CCTV – this is intrusive on the individuals as they move around the town centre or in and about Council premises. Individuals are, in theory, compelled to provide their images as the system uses cameras in public locations.

Step Two – Describe the information flow

The collection, use and deletion of personal data should be described here. You can include a data flow diagram if this helps.

Images are captured and recorded onto specific electronic storage devices. These images may be viewed by the CCTV operators (Staff or approved volunteers), the police or those submitting appropriate requests for information. If a request for viewing or a copy is received, the relevant form is completed and submitted to the DPA mailbox. This is then logged and the request passed to the CCTV Control Room Manager. The images are retrieved and downloaded to a password protected CD/DVD.

How many individuals are likely to be affected by the project or task?

Multiple individuals but specific number is unknown due to nature of task.

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? If you have already undertaken consultation, describe the outcomes.

Council Officers and Elected Members have been consulted, and the local and national media have been involved in promoting the relaunched CCTV System. The Blackpool BID team have been consulted and they in turn have consulted their members (businesses in the town centre). No adverse responses to this have been received.

Step 3 – identify the privacy and related risks

Identify the key privacy risks and the associated compliance and corporate risks. Is this recorded on a



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formal risk register?

Capture of images without explicit consent. Use of images for unauthorised purposes or in the media for purposes other than those specified.

Step 4 – identify the privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary e.g. production of new guidance, or security testing on a system.

Restrict access to the CCTV Control Room and restrict user access on the system.

Guidance produced for operators. Police Protocol written and agreed. CCTV Code of Practice has been developed based on the Information Commissioner and Surveillance Commissioner’s Codes of Practice.

Risk Solution result – is the risk eliminated, reduced or accepted?

Reduced and accepted.

Evaluation – is the final impact on individuals after implementing each solution a justified, compliant and proportionate response to the aims of the project or task?

It is recognised that CCTV surveillance has become a common feature of our daily lives. We are caught on numerous CCTV cameras as we move around our towns and cities, visit shops and offices, and travel on the road and other parts of the public transport network. Blackpool Council believes that the use of CCTV continues to enjoy general public support, but it necessarily involves intrusion into the lives of ordinary individuals as they go about their day to day business.

Blackpool Council believes that the public expect CCTV to be used responsibly with effective safeguards in place to maintain public trust and confidence in its use. The Council is committed to upholding the principles of the Data Protection Act 1998 (DPA), and all relevant legislation and regulations to ensure that the use of its CCTV systems does not unjustifiably infringe the rights of individuals.

It has been determined that the impact is justifiable as the alternative to meet the aims and objectives would require additional staff resources from all organisations which is not an option due to budget constraints and service requirements.

As the system is operated in line with the regulators Codes of Practice and the Security Industry Standards, the Council considers the system to be compliant and proportionate.

Step 5 – Sign off and record the PIA outcomes

Who has approved the privacy risks involved in this project or task? What solutions need to be implemented?



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Head of Visitors Services and Director of Places

Risk Approved Solution – approved by...

Head of Visitors Services

Step 6 – Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the project or task plan and updating any relevant paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns which may arise in the future?

A small Work-Task group comprising of key partners was established to plan and implement the CCTV relaunch. This group approved the solution taken and were responsible for implementing these.

The Information Governance Manager is the point of contact for Privacy Concerns. Contact can be made via the DPA@blackpool.gov.uk mailbox.

Action to be taken?

All policies, procedures and training to be completed prior to relaunch.

Date for completion of actions?

December 2015

What is the contact point for future privacy concerns?

The Information Governance Manager is the point of contact for Privacy Concerns. Contact can be made via the DPA@blackpool.gov.uk mailbox.

SECTION 3

Answering the following questions will help you identify where there is a risk that the project or task will fail to comply with the Data Protection Act or other relevant legislation, for example the Human Rights Act.

Principle 1

Personal data shall be processed fairly and lawfully

Question	Yes / No	Describe if necessary
Have you identified the purpose of the project or task?	Yes	



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Will individuals be told about the use of their personal data? And How?	Yes	Signage on street furniture
Do you need to amend your privacy notices?	No	
Have you established which conditions for processing apply?	Yes	Operator's guidance and Code of Practice.
If you are relying on consent to process personal data, how will this be collected and what will you do if it is withheld or withdrawn?	No	Unable to obtain consent due to nature of system.

If your organisation is subject to the Human Rights Act, you also need to consider:

Question	Yes / No	Describe if necessary
Will your actions interfere with the right to privacy under Article 8?	Yes	The cameras are in public locations.
Have you identified the social need and aims of the project or task?	Yes	See aim and objectives outlined previously.
Are your actions a proportionate response to the social need?	Yes	

Principle 2

Personal data shall be obtained only for one or more specified and lawful purposes, and shall not be further processed in any manner incompatible with that purpose or those purposes

Question	Yes / No	Describe if necessary
Does your project or task plan cover all of the purposes for processing personal data?	Yes	Outlined in the CCTV Code of Practice.
Have potential new purposes been identified as the scope of the project or tasks expands?	Yes	Insurance claims. Legal/Court Cases. Media Disclosures.

Principle 3

Personal data shall be adequate, relevant and not excessive in relation to the purpose or purposes for which they are processed.

Question	Yes / No	Describe if necessary
Is the information you are using of good enough quality for the purposes it is used for?	Yes	Digital recording held that is of Evidentiary quality.
Which personal data could you not use, without compromising the needs of the project or task?	N/A	None

Principle 4

Personal data shall be accurate and, where necessary, kept up to date.

Question	Yes / No	Describe if necessary
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If you are procuring new software does it allow you to amend data when necessary?	No	No requirement to amend but if this was necessary, separate Pixel Editing software would be required.
Are you ensuring that personal data obtained from individuals or other organisations is accurate?	Yes	Images of individuals captured.

Principle 5

Personal data processed for any purpose or purposes shall not be kept longer than is necessary for that purpose or those purposes.

Question	Yes / No	Describe if necessary
Have you determined a retention period that is suitable for the personal data you will be processing? And what is this?	Yes	30 Days.
Does the software allow you to delete information in line with your retention periods?	Yes	Includes Auto-delete unless the images are marked as being required for evidence.

Principle 6

Personal data shall be processed in accordance with the rights of data subjects under this Act.

Question	Yes / No	Describe if necessary
Will the systems you are putting in place allow you to respond to subject access requests more easily?	Yes	Subject Access Request Form published on website. Separate Insurance and Legal request form published. DPA Mailbox available. CCTV Control Room Manager undertakes downloads.
If the project or task involves marketing, have you got a procedure for individuals to opt out of their information being used for that purpose?	N/A	System is not used for marketing.

Principle 7

Appropriate technical and organisational measures shall be taken against unauthorised or unlawful processing of personal data and against accidental loss or destruction of, or damage to, personal data.

Question	Yes / No	Describe if necessary
Do any new systems provide protection against the security risks you have identified?	Yes	User access can be restricted.
Are training and instructions necessary to ensure that staff know how to operate a new system securely? And what are these?	Yes	SIA Training Course, operator guidance provided, CCTV Control Room Manager provides on-job training.



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Principle 8

Personal data shall not be transferred to a country or territory outside the European Economic Area unless that country or territory ensures and adequate level of protection for the rights and freedoms of data subjects in relation to the processing of personal data.

Question	Yes / No	Describe if necessary
Will the project or task require you to transfer data outside of the EEA?	No	
If you will be making transfers, how will you ensure that the data is adequately protected?	N/A	

