



**SURVEILLANCE CAMERA
COMMISSIONER**

ico.
Information Commissioner's Office

Data Protection Impact Assessment CCTV



Project name: CCTV Implementation

Data controller(s): Tinkers Lane Surgery

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 checked="" type="checkbox"/> Targeting children / vulnerable adults |
| <input checked="" 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) |

CCTV cameras will cover the Tinkers Lane Reception front desk area including the main entrance area and will include staff, patients, visitors and members of the public.

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)?

This is a new implementation and will be installed with effect from 15th February 2022.

All personal data processed by the CCTV system will be processed under the UK GDPR.

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 period; housing and community issues, etc.

The reason for the deployment of CCTV in the reception/main entrance area of Tinkers Lane Surgery is due to a number of incidents over the last 12 months where patients/visitors have been abusive both physically and verbally to staff. Accordingly, the deployment of CCTV and the clear signage to make staff, patients, visitors and members of the public aware that they are on CCTV on entry to the Practice, is to hopefully deter anyone from behaving in an abusive manner in the first instance, but if they do behave abusively, the CCTV will record this for any evidential requirements for the safety/benefit of staff, patients, visitors and members of the public alike.

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/>

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?

The data subjects whose personal data will be processed by the CCTV system will include staff, patients, visitors and members of the public including children and vulnerable groups of people.

The scope of the CCTV system is for crime prevention and public safety.

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.

Tinkers Lane Surgery will maintain sole access as the data controller. If another party was to request access, this would be reviewed on a case-by-case basis in line with our CCTV policy.

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

- | | |
|--|---|
| <input checked="" type="checkbox"/> Fixed CCTV (networked) | <input type="checkbox"/> Body Worn Video |
| <input type="checkbox"/> ANPR | <input type="checkbox"/> Unmanned aerial systems (drones) |
| <input type="checkbox"/> Stand-alone cameras | <input type="checkbox"/> Redeployable CCTV |
| <input type="checkbox"/> Other (please specify) | |

Fixed CCTV cameras will be installed.

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.

We are using the Swann Enforcer Security System with 4 hardwired cameras situated in the main waiting room and main entrance lobby incorporating the front reception desk (these are all public areas). The system includes the following specifications:

- Audio data recorded
- Transmission is via hardwired hardware
- No live monitoring or use of watchlists
- Video data recorded
- No auto facial recognition
- Recorded back to a 2 TB hard drive that is auto deleted after 30 days, unless footage required for any criminal/legal prosecution

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.

Video/Audio recorded and stored onsite on 2TB hard drive.

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)

Footage would be released in line with our CCTV policy to third party organisation on a case by case bases. E.g. the Police. This would be done via USB memory stick and a record of this would be kept.

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)

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
GP Team	Verbal	They recognize the requirement for it these days, for both staff and patient safety.	Installation of CCTV system with effect from 15 th February 2022.
Reception Team	Verbal	They welcome the implementation of it for both staff and patient safety given the escalation in incidents in recent times.	Installation of CCTV system with effect from 15 th February 2022.
Nursing Team	Verbal	They recognize the requirement for it these days, for both staff and patient safety.	Installation of CCTV system with effect from 15 th February 2022.
Management Team	Verbal	They recognize the requirement for it these days, for both staff and patient safety.	Installation of CCTV system with effect from 15 th February 2022.

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.

We have identified that it is in our and the data subjects' legitimate interest for the CCTV system to be in operation for the prevention and detection of crime, safeguarding staff and visitors, and ensuring compliance with health and safety procedures.

The lawful basis for processing the personal data captured by the CCTV system is legitimate interests under Article 6,1 (f) of the UK GDPR.

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 use of CCTV recording is already covered in our Privacy notice, this is available on our website and at reception. We also display a poster at reception with the contact details for SAR.

CCTV recording posters will be added to the outside of the building with the following message:

"Images are being monitored and recorded for the purposes of crime prevention and public safety

This scheme is controlled by:
Tinkers Lane Surgery

For more information, contact by email at:
tinkers.lanesurgery@nhs.net

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?

We will review with staff members if they feel safer when entering and exiting the building. We will audit the system, to ensure it is recording the minimum required data as retaining data inline with the below data retention period. Privacy masks will be used to ensure we are not recording images outside of the property boundary e.g. public roads, foot paths.

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

Recordings will not normally be kept for longer than one month before they are erased unless there is an on-going Police investigation.

This is to give time for an incident to come to light and images review and copies provided to relevant authorities as required. Whilst also trying to protect the interests of data subjects and keep recording time to a minimum.

Date and version control: 19 May 2020 v.4

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)

The hard drive will automatically over right after one month.

A manual extraction would need to be made to a USB memory stick. This would be done when required for law enforcement agencies and a record made of the occurrences.

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?

The video recorded is kept in a secure area of the building with limited access. The recorded is not connected to the internet and no remote access is possible.

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.

Inline with our SAR policy, we would request to know a specific date and time, and a description of the person requesting the images. Proof of your identity would also be required. We will then review the footage and provide a copy to the data subject on a USB memory stick.

Footage would not be provided if it has already been overwritten, other people can be seen in it or if the release of the footage could affect an ongoing criminal investigation.

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.

Improved lighting had been implemented and has not completely removed the risk of staff entering an leaving the building. In addition, the alternative that was considered was employing security staff at the main entrance/reception area. This was discounted as it was thought to be potentially intimidating for patients and not a cost effective solution. The CCTV solution was considered better for the safety and security of staff, patients, visitors and members of the public.

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)

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
Personal data retained for longer than necessary or personal data collected and stored unnecessarily	Remote	Significant	Low
Disclosure of personal data to unauthorised persons or agencies	Possible	Significant	Low
Surveillance disproportionate to need	Remote	Significant	Low
Unauthorised third-party access to images	Possible	Significant	Medium

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. Assess 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?
Video recorded will be set to limit recordings to 30 days as per our data retention policy. Data will only be retained for long than this when we are notified before deletion that they are required. This will be reviewed on a case-by-case bases.	Reduced to acceptable level	Low	Yes
Images will only be released when there is a lawful reason to do so. This could be as part of a SAR or for a criminal investigation. Access to recorded images is set out in our CCTV policy.	Reduced to acceptable level	Low	Yes
The CCTV system has been designed to keep the number of camera required to the minimum needed to complete the objective of prevention and detection of crime, safeguarding staff and visitors, and ensuring compliance with health and safety procedures. Any cameras which have a view outside of our property boundry will have a privacy mask set up to prevent recording in these areas	Reduced to acceptable level	Low	Yes

Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
<p>The CCTV recording equipment will be kept in a secure location.</p> <p>Viewing of the CCTV is limited to staff areas, where only authorised people can access.</p> <p>Visitor logs are kept for any third party having access to staff areas of the building.</p> <p>Identity will be confirmed for members of the public who submit a SAR.</p>	Reduced to acceptable level	Low	Yes

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:	Robin Noel Managing Partner 15 th February 2022	Integrate actions back into project plan, with date and responsibility for completion.
Residual risks approved by:	Robin Noel Managing Partner 15 th February 2022	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:	Jason Roberts	DPO should advise on compliance and whether processing can proceed.
Summary of DPO advice: The practice privacy notice may need a review to ensure the CCTV footage retention period is specified. Once the CCTV Policy is implemented and the privacy notice review has been completed, the processing can proceed.		
DPO advice accepted or overruled by: (Specify role/title)	Robin Noel Managing Partner	If overruled, you must explain your reasons.
Comments:		