



# **DATA PROTECTION IMPACT ASSESSMENT**

**CARRYING OUT A DATA PROTECTION IMPACT ASSESSMENT  
ON SURVEILLANCE CAMERA SYSTEMS**

## Purpose of this advice and template

Principle 2 of the surveillance camera code of practice<sup>1</sup> states that the use of a surveillance camera system must take into account the effect on individuals and their privacy, with regular reviews to ensure its use remains justified. The best way to ensure this is by carrying out a data protection impact assessment (DPIA) before any surveillance camera system is installed, whenever a new technology or functionality is being added on to an existing system, or whenever there are plans to process more sensitive data or capture images from a different location. This will assist in assessing and mitigating any privacy issues linked to the use of a surveillance system.

A DPIA is one of the ways that a data controller can check and demonstrate that their processing of personal data is compliant with the General Data Protection Regulation (GDPR)<sup>2</sup> and the Data Protection Act (DPA) 2018. There are statutory requirements to carry out a DPIA in Section 64 DPA 2018 and article 35 of the GDPR.

The Information Commissioner has responsibility for regulating and enforcing data protection law, and has published detailed [general guidance](#) on how to approach your data protection impact assessment. In many cases under data protection law, a DPIA is a mandatory requirement. The Surveillance Camera Commissioner (SCC) and the Information Commissioner's Office (ICO) has worked together on this advice, which is tailored to the processing of personal data by surveillance camera systems.

Suggested steps involved in carrying out a DPIA are shown in **Appendix One**.

A further benefit of carrying out a DPIA using this template is that it will help to address statutory requirements under the Human Rights Act 1998 (HRA). Section 6(1) HRA provides that it is unlawful for a public authority to act in a way which is contrary to the rights guaranteed by the European Convention on Human Rights (ECHR). Therefore, in addition to the above, as a public body or any other body that performs public functions you must make sure that your system complies with HRA requirements. Whilst the particular human rights concerns associated with surveillance tend to be those arising from Article 8 which sets out a right to respect for privacy, surveillance does also have the potential to interfere with rights granted under other Articles of the ECHR such as conscience and religion (Article 9), expression (Article 10) or association (Article 11).

If you identify a high risk to privacy that you cannot mitigate adequately, data protection law requires that you must consult the ICO before starting to process personal data. Use of any surveillance camera system with biometric capabilities, such as Automated Facial Recognition technology, is always likely to result in a high risk to the rights and freedoms of individuals and therefore a DPIA must always be carried out in respect of those systems before you process any personal data. There is a risk matrix at **Appendix Two** that can help you to identify these risks.

## Who is this template for?

To complement the ICO's detailed general guidance for DPIAs, the SCC has worked with the ICO to prepare this template specifically for those organisations in England and Wales that must have regard to the Surveillance Camera Code of Practice under Section 33(5) of the Protection of Freedoms Act 2012. This template helps such organisations to address their data protection and human rights obligations in the specific context of operating surveillance cameras.

This surveillance camera specific DPIA is also intended to be of value to the wider community of public authorities and any other bodies, whether public or private, who perform public functions. This secondary audience is subject to the same legal obligations under data protection and human rights legislation, and

---

<sup>1</sup> Surveillance Camera Code of Practice issued by the Home Secretary in June 2013 under Section 30(1)(a) Protection of Freedoms Act 2012

<sup>2</sup> Regulation (EU) 2016/679 of the European Parliament and European Council, also known as the General Data Protection Regulation, was transposed into UK law through the Data Protection Act 2018. Any processing of personal data by competent authorities for the prevention, investigation, detection or prosecution of criminal offences is regulated under Part 3 of the Data Protection Act 2018 which transposes Directive (EU) 2016/680, also known as the Law Enforcement Directive, into UK law.



is encouraged by the SCC to follow guidance in the Surveillance Camera Code of Practice on a voluntary basis.

## When should you carry out the DPIA process for a surveillance camera system?

- Before any system is installed.
- Whenever a new technology or functionality is being added on to an existing system.
- Whenever there are plans to process more sensitive data or capture images from a different location.

In deciding whether to carry out a DPIA and its scope, consideration must be given to the nature and scope of the surveillance camera activities and their potential to interfere with the privacy rights of individuals.

You **must** carry out a DPIA for any processing of surveillance camera data that is likely to result in a high risk to individual privacy. The GDPR states that a DPIA "shall in particular be required in the case of ..... systematic monitoring of publicly accessible places on a large scale" (Article 35).

Furthermore, as a controller in relation to the processing of personal data, you must seek the advice of a designated Data Protection Officer when carrying out a DPIA.

To assess the level of risk, you must consider both the likelihood and the severity of any impact on individuals. High risk could result from either a high probability of some harm, or a lower possibility of serious harm. It is important to embed DPIAs into your organisational processes such as project planning and other management and review activities, and ensure the outcome can influence your plans. A DPIA is not a one-off exercise and you should see it as an ongoing process, and regularly review it.

As part of an ongoing process, your DPIA should be updated whenever you review your surveillance camera systems, it is good practice to do so at least annually, and whenever you are considering introducing new technology or functionality connected to them.

The situations when a DPIA should be carried out, include the following:

- When you are introducing a new surveillance camera system.
- If you are considering introducing new or additional technology that may affect privacy (e.g. automatic facial recognition, automatic number plate recognition (ANPR), audio recording, body worn cameras, unmanned aerial vehicles (drones), megapixel or multi sensor very high resolution cameras).
- When you are changing the location or field of view of a camera or other such change that may raise privacy concerns.
- When you are reviewing your system to ensure that it is still justified. Both the Surveillance Camera Code of Practice and the ICO recommend that you review your system annually.
- If your system involves any form of cross referencing to other collections of personal information.
- If your system involves more than one company or agency undertaking activities either on your behalf or in their own right.
- When you change the way in which the recorded images and information is handled, used or disclosed.
- When you increase the area captured by your surveillance camera system.
- When you change or add an end user or recipient for the recorded information or information derived from it.

If you decide that a DPIA is not necessary for your surveillance camera system, then you must record your decision together with the supporting rationale for your decision.

## Description of proposed surveillance camera system

### Provide an overview of the proposed surveillance camera system

This should include the following information:

- An outline of the problem(s) the surveillance camera system is trying to resolve.
- Why a surveillance camera system is considered to be part of the most effective solution.
- How the surveillance camera system will be used to address the problem (identified above).
- How success will be measured (i.e. evaluation: reduction in crime, reduction of fear, increased detection etc).

In addition, consideration must be given to the lawful basis for surveillance, the necessity of mitigating the problem, the proportionality of any solution, and the governance and accountability arrangements for any surveillance camera system and the data it processes.

The following questions must be considered as part of a DPIA:

- Do you have a lawful basis for any surveillance activity?
- Is the surveillance activity necessary to address a pressing need, for example: public safety; the prevention, investigation, detection or prosecution of criminal offences; or, national security?
- Is surveillance proportionate to the problem that it is designed to mitigate?

**If the answer to any of these questions is no, then the use of surveillance cameras is not appropriate.**

**Otherwise please proceed to complete the template below, where your initial answers to these questions can also be recorded.**



# DATA PROTECTION IMPACT ASSESSMENT TEMPLATE

Statutory requirements in Section 64 DPA 2018 and article 35 of the GDPR are that your DPIA **must**:

- describe the nature, scope, context and purposes of the processing;
- assess necessity, proportionality and compliance measures;
- identify and assess risks to individuals; and
- identify any additional measures to mitigate those risks.

Statutory requirements in Sections 69-71 DPA 2018 and articles 37-39 of the GDPR are that if you are a public authority, or if you carry out certain types of processing activities, you **must** designate a Data Protection Officer (DPO) and always seek their advice when carrying out a DPIA. The ICO provides [guidance on the requirement to appoint a DPO](#). If you decide that you don't need to appoint a DPO you should record your decision and your supporting rationale. In the performance of their role, a DPO must report to the highest management level within the controller.

These statutory requirements indicate that a DPIA should be reviewed and signed off at the highest level of governance within an organisation.

To help you follow these requirements this template comprises two parts.

**Level One** considers the general details of the surveillance camera system and supporting business processes, including any use of integrated surveillance technologies such as automatic facial recognition. It is supported by **Appendix Three** which helps to capture detail when describing the information flows. The SCC's [Passport to Compliance](#) provides detailed guidance on identifying your lawful basis for surveillance, approach to consultation, transparency and so on.

**Level Two** considers the specific implications for the installation and use of each camera and the functionality of the system.

## Template – Level One

Location of surveillance camera system being assessed:

North Devon Council sites: BEC and Lynton House. LH system is only internal to the building but will be designed to record in the public area of the building. BEC is not a routinely a public building; but does hold public meetings. The system at BEC will be designed to record internally and externally.

Date of assessment

05.03.2019

Review date

05.03.2019

Name of person responsible

Chay Mckenzie/ Jon Triggs

Name of Data Protection Officer

Simon Fuller

### GDPR and Data Protection Act 2018 and Surveillance Camera Code of Practice

**1. What are the problems that you need to address in defining your purpose for using the surveillance camera system?** Evidence should be provided which includes relevant available information, such as crime statistics for the previous 12 months, the type, location, times and numbers of crime offences, housing issues relevant at the time, community issues relevant at the time and any environment issues relevant at the time.

The issues NDC are looking to address with the use of its CCTV system are: crime prevention and detection, reduction of disorder in and around NDC buildings, ability to monitor H&S issues within and around NDC buildings, ability to use educate and train using robust evidence, reduction of ASB directed at staff in Lynton House, along with ability to record interviews for training.

An upgrade to the current system was a key recommendation from the security report completed by Mazars in Aug 2017, Mazars are an independent security expert. Along with other recommendations, Mazars recommended adding CCTV to cover entrance and exit points from our buildings.

Lynton House is already covered by CCTV but the quality of the data makes its usefulness limited. This project will upgrade all current camera positions to higher definition cameras, additional CCTV is to be added internally to cover entrances, interview rooms and waiting areas. Routine monitoring of cameras and areas is not foreseen.

Housing officers, being part of a front line service, deal with a wide range of vulnerable clients on a daily basis. Clients can present at Lynton House with a number of issues:

- Mental Health
- Drug/Alcohol dependency issues
- Physical disabilities
- History of violent tendencies
- Anger issues.

Clients and members of the public can become volatile and so putting the officer and other members of the public at risk. Currently CCTV is installed in the interview rooms at Lynton House and in the main reception area for the above reasons, NDC would need to continue with this coverage for the health and safety of officers and members of the general public. Coverage in these areas allow for investigations and action to be taken to reduce risks of repeat offending. Awareness of CCTV can also encourage good behaviour and so is hoped to decrease the frequency of incidents.

The employment of a security guard to reduce the risks to officers/ public has been considered. But rejected as this can antagonise a situation, this is significant costs and still would not provide robust evidence.



Additional cameras are to be installed at LH to cover entrances. A door access system was recently installed at LH which restricts the potential for members of the public to freely make their way through the building: and so compromising building, data and staff security, this CCTV will add to the system and highlight uninvited visitors, tail gaters or criminal activities.

A Court yard camera at LH will record and log the high risk transfer of cash by the parking team. This court yard has been subject to minor crime in the last 12 months, where an officers' belongings were taken. Recording in this area would have provided either the robust evidence to investigation or act as a deterrent.

A monitoring screen is also to be added, behind the main reception desk, this screen will show footage from the waiting area and only display images which could be observed by simply looking about. This display screen is also useful as a means of being transparent about the CCTV recording the Council is carrying out, including specifically the area covered by CCTV.

BEC is also already covered by CCTV and has the same door access controls as LH, but again the quality of the image produced is of limited usefulness. To complement the current cameras new higher definition cameras will be added both internally to cover all building entrances and external new cameras are to be added to cover the car parks, workshop and other secure work areas. Routine monitoring of cameras and areas are not foreseen.

CCTV is required at BEC for the following reasons;

- Ensure valuable council assets are protected from theft or damage. In the last 12 months we have to two recorded attempts at break ins. The current system was unable to supply detailed data to investigate. Any break in to the BEC building and/ or yard will have 1, significant financial costs i.e 30 plus vehicles parked in the yard over night app value £100k each, 2, data protection breaches and associated bad press/ officer hours 3, Safety breaches- the yard is a dangerous environment for any trespasser.
- For health & safety purposes, to ensure procedures are followed, the works areas are potentially dangerous environments the cameras will provide robust evidence to investigate breaches and protect the council against bogus insurance claims.
- To record damage caused by vehicular accidents to other vehicles or the building. So allowing robust investigation into accidents or wilful acts. In the last 12 months there have been at least 5 cases where the BEC building has been damaged by council or contractor vehicles: lack of data made investigation impossible.
- Helps provide a secure environment for staff. The system will encourage good behaviour within and around the site.
- To identify when damage to private vehicles in the car park has occurred. Robust investigations are not currently completed due to lack of good data.
- In disciplinarys where an assault may or may not have taken place. Robust data is required for the investigation.
- To identify smoking in non authorised areas following fire alarm being triggered. There are a number of risks associated with unauthorised smoking at BEC. Within the last 18 months we have had one building evacuation due to this, no further action was taken due to lack of data..

**2. Can surveillance camera technology realistically mitigate the risks attached to those problems?** State why the use of surveillance cameras can mitigate the risks in practice, including evidence to justify why that would be likely to be the case.

Both LH and BEC have a range of security measures in place; intruder alarm, door access control, high fencing and security lighting at BEC. But CCTV acts is an additional deterrent to ASB, crime, disorder and poor safety practises. The cameras will aim to support and supplement existing staff training to ensure NDC offer a safe working environment to our officers and a safe public space. Both LH and BEC are unmanned over night, a security contractor drives by and checks BEC/ LH at least once a night and



the intruder alarms are remotely monitored. But without CCTV an investigation into safety or criminal incidents will be restricted. Identification of individuals causing damage to our buildings or gaining non permitted access is fundamental to the success of the system. A new system has the potential to allow remote viewing of the camera feeds. This access will be limited to key officers- as detailed in the CCTV policy-. Remote access will prevent an officer entering a potentially dangerous situation, help identify false alarms and allow monitoring/ management of situations of disorder.

The upgrade project is fully supported by SMT. Funds are in place for the upgrade and install of the systems. There are no or little ongoing monitoring costs. Annual budgets are already in place as NDC are already contracted to pay for maintenance of the current system; it is not foreseen that the upgrade system will not result in significant increases in these costs.

The system allows for a degree of flexibility, in that additional camera could be added to the system. During an annual review camera locations will be examined to discuss if camera positions should be removed or added to. This could be achieved by either physically removing the camera or electronically and simply shutting down that location.

The camera will identify both traffic and people. The ability to detail persons is paramount to the success of the system. Without the capture of robust evidence the ability to investigate or address issues will be very difficult. Although other measures are in place: staff training, lighting, site fencing and door access control the clear and detailed images that CCTV can supply provides the robust data required for detailed investigations.

### **3. What other less privacy-intrusive solutions such as improved lighting have been considered?**

There is a 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 24/7? Where these types of restrictions have been considered, provide your reasons for not relying on them and opting to use surveillance cameras as specified.

The camera schedule details where restriction panels and/ or vision angles will be clearly defined. At this time it is considered that each camera will be run 24/7, additional privacy issues are not foreseen due to this duration, the Council's premises are closed outside of working hours hence the system will not capture individuals, save for individuals whom are not permitted to be there.

The CCTV schedule highlights where images outside of the scope of system may be captured and what steps will be taken to limit identification of persons.

The current external lighting is deemed satisfactory and provides perimeter lighting at BEC, external lighting at LH is by public street lamps apart from the court yard- this is area is locked outside of normal working hours.

Improvements have been made in regard to building and staff security, for example door access system and staff training, but in order to be provide robust evidence for criminal or safety investigations CCTV is felt to provide the only additional enhanced solution.

### **4. What is the lawful basis for using the surveillance camera system? State which lawful basis for processing set out in Article 6 of the GDPR or under Part 3 of DPA 2018 applies when you process the personal data that will be captured through your surveillance camera system.**

It is recognised that operation of the North Devon CCTV system may be considered to infringe on the privacy of individuals. The owner recognises that it is their responsibility to ensure that the scheme should always comply with all relevant legislation, to ensure its legality and legitimacy. All data will be processed in accordance with the principles of current Data Protection legislation. Details of how data will be obtained and processed can be found within the CCTV policy and NDC data protection policy.



North Devon Council recognises that public authorities and those organisations carrying out the functions of a public service nature are required to observe the obligations imposed by the Human Rights Act 1998, and consider that the use of CCTV within its buildings is a necessary, proportionate and suitable tool to help reduce crime, reduce the fear of crime and improve public/officer safety while protecting the councils assets.

**5. Can you describe the information flows?** State how data will be captured, whether it will include audio data, the form of transmission, if there is live monitoring or whether data will be recorded, whether any integrated surveillance technologies such as automatic facial recognition is used, if there is auto deletion after the retention period, written procedures for retention in line with stated purpose, written procedures for sharing data with an approved third party, record keeping requirements, cyber security arrangements and what induction and ongoing training is provided to operating staff. Specific template questions to assist in this description are included in **Appendix Three**.

Details of the information retention can be found in the NDDC CCTV and building security procedure. This procedure document also contains details on how data can be requested and shared.

The privacy design features to be included are outlined in the camera schedule.

The data is recorded and maintained within NDC servers. These servers are located in a secure area which is protected by a door entry system which is programmed to limit access to key ICT staff. Access to this server room is for authorised personnel by appointment only and all callers are authenticated prior to entry and required to sign in and out of the premises. The CCTV system can be monitored remotely but access is password protected and via NDC servers, officers given access to remote view will need to obtain permission, as per the CCTV policy, from the data protector. The need for officers to have such access will be regularly reviewed. The data recorded is limited to 33 days by the memory capacity of the DVR. It is proposed that this record time will be reduced to 7 day and is then automatically deleted, these will allow time to back up data in case a investigation is proposed.

Further additions to the CCTV system would follow the same procedure as outlined in this document. Justification will be outlined for each new location..

**6. What are the views of those who will be under surveillance?** Please outline the main comments from the public resulting from your consultation – as part of a DPIA, the data controller should seek the views of those subjects who are likely to come under surveillance or their representatives on the proposition, without prejudice to the protection of commercial or public interests or the security of processing operations. This can often be achieved by existing local consultation mechanisms such as local area committees or safer neighbourhood team meetings; but, if necessary depending on the privacy intrusion of the surveillance in question, other methods could be considered such as face to face interviews, online surveys, questionnaires being sent to residents/businesses and addressing focus groups, crime & disorder partnerships and community forums. The Data Protection Officer may be able to offer advice on how to carry out consultation.

Consulation planned to question a cross section of staff at both LH and BEC; in addition views will be sought from Work Force Matters, Unions. At this time the views of the public are not to be sought as this is deemed disproportionate. No complaints have been received by the FM team in the last three years in regard to the way the system is monitored and used. Issues only arise regarding the quality of the current data and its ineffectiveness as evidence for investigation.

It has been made clear to members of staff via: staff briefing, SMT and heads of service that a CCTV project is underway, to date no concerns have been raised.

A questionnaire was circulated to all empolyees of NDC. The data is included in the appendix of this document. This was positive support and a fair return rate for the improvements to the CCTV system. All items and comments raised will be worked through as part of the implementation of the project.



**7. What are the benefits to be gained from using surveillance cameras?** Give specific reasons why this is necessary compared to other alternatives. Consider if there is a specific need to prevent/detect crime in the area. Consider if there would be a need to reduce the fear of crime in the area, and be prepared to evaluate.

The use of CCTV allows for the collection of robust data to pursue and investigate; crimes, disorder and safety issues at BEC and LH. See section 1.

Improvements have been made in regard to building and staff security, for example door access system and staff training, but in order to be provide robust evidence for criminal or safety investigations CCTV is felt to provide the only additional enhanced solution.

**8. What are the privacy risks arising from this surveillance camera system?** State the main privacy risks relating to this particular system. For example, who is being recorded; will it only be subjects of interests? 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? What is your assessment of both the likelihood and the severity of any impact on individuals?

Images of all NDDC staff, visitors to BEC and LH will be caught. In addition BEC outside area will also be captured- but all with NNDC ownership. The system at Lynton House has the potential to capture members of the public walking past the main entrance doors, restriction or vision blocks will be added to these camera if required.

At this time no recording of sound is planned, although the new cameras do have this capability the feature will be switched.

**9. Have any data protection by design and default features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements?** State the privacy enhancing techniques and other features that have been identified, considered and accepted or rejected. For example, 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? If these have not been adopted, provide a reason.

The privacy design features to be included are outlined in the camera schedule.

The data is recorded and maintained within NDC servers. These servers are located in a secure area which is protected by a door entry system which is programmed to limit access to key ICT staff. Access to this server room is for authorised personnel by appointment only and all callers are authenticated prior to entry and required to sign in and out of the premises. The CCTV system can be monitored remotely but access is password protected and via NDC servers, officers given access to remote view will need to obtain permission, as per the CCTV policy, from the data protector. The need for officers to have such access will be regularly reviewed. The data recorded is limited to 33 days by the memory capacity of the DVR. It is proposed that this record time will be reduced to 7 day and is then automatically deleted, these will allow time to back up data in case a investigation is proposed.

Further additions to the CCTV system would follow the same procedure as outlined in this document. Justification will be outlined for each new location.

**10. What organisations will be using the surveillance camera images, and where is the controller responsibility under the GDPR and Data Protection Act 2018?** List the organisation(s) that will use the data derived from the camera system and identify their responsibilities, giving the name of the data controller(s) and any data processors. Specify any data sharing agreements you have with these organisations.

The NDDC CCTV and building security policy defines who can access data and when data will be made available. Clear restrictions will be in place and how and when data can be requested. A clear management system is detailed in the policy document.



**11. Do the images need to be able to recognise or identify individuals, or could the purpose be met using images in which individuals cannot be identified?** Explain why images that can recognise or identify people are necessary in practice. For example, cameras deployed for the purpose of ensuring traffic flows freely in a town centre may not need to be capable of capturing images of identifiable individuals, whereas cameras justified on the basis of dealing with problems reflected in assessments showing the current crime hotspots may need to capture images in which individuals can be identified.

The camera will identify both traffic and people. The ability to detail persons is paramount to the success of the system. Without the capture of robust evidence the ability to investigate or address issues will be very difficult. Although other measures are in place: staff training, lighting, site fencing and door access control the clear and detailed images that CCTV can supply provides the robust data required for detailed investigations.

**12. How will you inform people that they are under surveillance and respond to any Subject Access Requests, the exercise of any other rights of data subjects, complaints or requests for information?** State what privacy notices will be made available and your approach to making more detailed information available about your surveillance camera system and the images it processes. In addition, 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.

The camera justification documents contain details of signage to be installed. Full details of the process for requesting camera footage can be found in the NDDC CCTV and building security document.

**13. How will you know if the particular camera system/hardware/software/firmware being considered does deliver the desired benefits now and in the future?** It is good practice to review the continued use of your system on a regular basis, at least annually, to ensure it remains necessary, proportionate and effective in meeting its stated purpose. State how the system will continue to meet current and future needs, including your review policy and how you will ensure that your system and procedures are up to date in mitigating the risks linked to the problem.

A annual review meeting is to be scheduled with Data protection team and key site personnel. Each camera location will be reviewed during these meeting to decide coverage is adequate or excessive. The CCTV and building security document will also be reviewed and any lessons learnt from the previous 12 months will be used to update and refine the document.

**14. What future demands may arise for wider use of images and how will these be addressed?** Consider whether it is possible that the images from the surveillance camera system will be processed for any other purpose or with additional technical factors (e.g. face identification, traffic monitoring or enforcement, automatic number plate recognition, body worn cameras) in future and how such possibilities will be addressed. Will the camera system have a future dual function or dual purpose?

North Devon Council recognises that public authorities and those organisations carrying out the functions of a public service nature are required to observe the obligations imposed by the Human Rights Act 1998, and consider that the use of CCTV within its buildings is a necessary, proportionate and suitable tool to help reduce crime; reduce the fear of crime and improve public/officer safety while protecting the councils assets.

The full specification of each camera can be found in the camera justification documents.

**15. Have you considered the extent to which your surveillance camera system may interfere with the rights and freedoms conferred under the European Convention on Human Rights?** When we consider data protection, our focus tends to be upon the potential to interfere with the Article 8 right to respect for private and family life. Surveillance undertaken in accordance with the law could, however, interfere with other rights and freedoms such as those of conscience and religion (Article 9), expression (Article 10) or association (Article 11). Summarise your assessment of the extent to which you might interfere with ECHR rights and freedoms, and what measures you need to take to ensure that any interference is necessary and proportionate.

North Devon Council recognises that public authorities and those organisations carrying out the functions of a public service nature are required to observe the obligations imposed by the Human Rights Act 1998, and consider that the use of CCTV within its buildings is a necessary, proportionate and suitable tool to help reduce crime, reduce the fear of crime and improve public/officer safety while protecting the councils assets.

The scheme will only be used as a proportional response to identified problems and be used only in so far as it is necessary in a democratic society, in the interests of building security, public/ officer safety, the economic protection of valuable Councils assets and/ or for the prevention and detection of crime or disorder.

**16. Do any of these measures discriminate against any particular sections of the community?**

Article 14 of the ECHR prohibits discrimination with respect to rights under the Convention. Detail whether the proposed surveillance will have a potential discriminatory or disproportionate impact on a section of the community. For example, establishing a surveillance camera system in an area with a high density of one particular religious or ethnic group.

It is not foreseen that the system will be discriminatory or disproportionate. If on review, the system has over reached in this respect action will be taken to reduce the impact.



**Measures approved by:**

Integrate actions back into project plan, with date and responsibility for completion

Name

JON TRIGGS

Date

17/5/19

**Residual risks approved by:**

If you identify a high risk that you cannot mitigate adequately, you must consult the ICO before starting to capture and process images

Name

JON TRIGGS

Date

17/5/19

**DPO advice provided:**

DPO should advise on compliance and whether processing can proceed

Name

Sefu Simon Fuller

Date

20/05/2019

Summary of DPO advice

Privacy implications of project have been appropriately considered. This DPIA should be periodically reviewed and updated as and when changes are made to the CCTV system.

**DPO advice accepted or overruled by:**

If overruled, you must explain your reasons

Name

JON TRIGGS

Date

17/5/19

Comments

Accepted.

**Consultation responses reviewed by:**

If your decision departs from individuals' views, you must explain your reasons

Name

CHAY MCKENZIE

Date

17/5/19

Comments

**This DPIA will kept under review by:**

The DPO should also review ongoing compliance with DPIA

Name

CHAY MCKENZIE

Date

17/5/19



## Appendix one

### CCTV Camera Schedule for North Devon Council site; Brynsworthy Environment Centre, Roundswell, Barnstaple.

Schedule to be read in conjunction with site plans.

Camera Reference	Camera style/ Location	Picture View	Justification
BEC 1	Motorised lens. External. High level on new modular building	Looking at top parking area.	<p>Camera used for crime prevention and detection. Monitoring parking areas will reduce insurance claims and encourage good behaviour; reducing the number of door strike incidents.</p> <p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues and site traffic speed.</p> <p>This camera will catch any one entering/ exiting the BEC site; either invited or not and so will act as a deterrent to anyone entering our site without permission. There is a potential for recording member of the public entering the BEC and travelling to Saunders Yard. Clear signage to be installed on front gate/ fence outlining the details of the system.</p> <p>The angle of visions will need to be limited in order to avoid accidental capture of images from the bungalows to the side of BEC.</p>



BEC 2	Motorised lens. External. High level on new modular building	Looking at main parking area	<p>Camera used for crime prevention and detection. Monitoring parking areas will reduce insurance claims and encourage good behaviour; reducing the number of door strike incidents.</p> <p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues and site traffic speed.</p> <p>This camera will catch any one entering/ exiting the BEC site; either invited or not and so will act as a deterrent to anyone entering our site without permission. There is a potential for recording member of the public entering the BEC and making their way to Saunders Yard. Clear signage to be installed on front gate/ fence outlining the details of the system.</p> <p>The angle of visions will need to be limited in order to avoid accidental capture of images from the bungalows to the side of BEC.</p>
BEC 3	Motorised lens. External. High level on new modular building	Looking at visitors parking area	<p>Camera used for crime prevention and detection. Monitoring parking areas will reduce insurance claims and encourage good behaviour; for example reducing the number of door strike incidents.</p>



BEC 4	Motorised lens. External. Perimeter fence.	Looking towards vehicle workshop.	<p>Camera used for crime prevention and detection. The area covered by this camera is a secure area and so only employees or contractors should be caught by the CCTV.</p> <p>This camera would record anyone trying to access the workshop. The workshop has had one potential break in with in the last twelve months. The current camera/ system, was not detailed/ controllable enough to capture the incident.</p> <p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues around the lorry wash pit and site traffic speed. The camera will not be used to mitigate our responsibility for Health &amp; Safety but will be used to educate and train.</p> <p>This camera will help protect the valuable council assets (buildings/ vehicles / plant).</p>
-------	--------------------------------------------	-----------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



BEC 5	Motorised lens. External. High level side of main building.	Looking down side elevation towards Saunders Yard.	<p>Camera used for crime prevention and detection.</p> <p>This camera would record anyone trying to access the main building via the LGF external door or trying to enter the secure site via the lower site gate. This camera will help protect the valuable council assets (buildings/ vehicles / plant).</p> <p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues and site traffic speed.</p> <p>The camera will also capture members of the public entering and exiting the site, who may be visiting Saunders Yard. Clear signage will be installed on the main BEC site fence.</p>
BEC 6	Dome, Internal. Ceiling surface mounted.	Looking towards main entrance door.	<p>Camera used for crime prevention and detection. This camera would record anyone trying to access the main building via the main entrance door. This camera adds to the general security of the building and backs up the door access controls.</p>

			<p>It will highlight 'tail gating' of staff by uninvited individuals who may pose a building or data security risk.</p> <p>Signage will need to be added to the main entrance door detailing the data holder and CCTV policy details.</p>
BEC 7	Dome, Internal. Ceiling surface mounted.	LGF corridor. Covering server room and process hall door.	<p>This camera will be used to provide additional backup to the door access system. The access system restricts the movement of visitors and staff to key areas of BEC. The server room is key NDC IT operation and so unauthorised access could have major issues. Likewise unauthorised access to the process hall would pose a significant safety issue to untrained individuals.</p> <p>This area is subject to frequent minor vandalism: Broken clocking in machine, door to process hall forced. It is hoped this camera will encourage good behaviour from both staff and visitors. If required the feed will provide robust data for a criminal or safety investigation</p>
BEC 8	Dome, Internal. Ceiling surface mounted.	LGF corridor. Covering entrance to building (by	<p>This camera will be used to provide additional backup to the door access system. The access system</p>



		canteen) and document store.	<p>restricts the movement of visitors and staff to key areas of BEC.</p> <p>The camera could be used to provide a record of who has entered the document store; and so reduce any risks around lone working in the area.</p> <p>This area is subject to frequent minor vandalism and it is hoped this camera will encourage good behaviour from both staff and visitors. The final exit door is also prone to be wedged open by members of staff, so reducing the building security. A camera in this location will identify these persons.</p>
BEC 9	Dome, Internal. Ceiling surface mounted.	LGF corridor. Covering entrance to building (by EH&H).	<p>This camera will be used to provide additional backup to the door access system. The access system restricts the movement of visitors and staff to key areas of BEC.</p> <p>This area is subject to frequent minor vandalism and it is hoped this camera will encourage good behaviour from both staff and visitors. The final exit door is also prone to be wedged open by members of staff, so reducing the building security. A camera in this location will identify these persons.</p>

BEC 10	360' view. Internal.	Processhall.	<p>The process hall is a potentially dangerous working environment due to the recycling sorting plant and number of vehicles coming and going.</p> <p>Camera in this location will be used to highlight and prevent poor safety practices. The footage will also be used as evidence in insurance claims both actioned by the Council against 3<sup>rd</sup> parties and claims against the Council. Significant damage has previously been caused to the roof structure of the process hall by careless operation of contractor vehicles, the lack of robust evidence made pursuing a 3<sup>rd</sup> party very difficult.</p> <p>The large section doors leading in to the hall subjected to a number of vehicle impacts each year, with a contractor call out to rectify damage costing at least £800. Footage from this camera will help with staff training and identification of causes.</p> <p>This camera could also be used to monitor the levels of recycling materials in the process hall. This prevents staff needing to enter the hall and so reducing risks.</p> <p>This camera works in combination with BEC 11 to provide a detailed level of cover for the entire hall.</p>
--------	----------------------	--------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



BEC 11	360' view. Internal.	Processhall.	<p>The process hall is a potentially dangerous working environment due to the recycling sorting plant and number of vehicles coming and going.</p> <p>Camera in this location will be used to highlight and prevent poor safety practices. The footage will also be used as evidence in insurance claims both actioned by the Council against 3<sup>rd</sup> parties and claims against the Council. Significant damage has previously been caused to the roof structure of the process hall by careless operation of contractor vehicles, the lack of robust evidence made pursuing a 3<sup>rd</sup> party very difficult.</p> <p>The large section doors leading in to the hall subjected to a number of vehicle impacts each year, with a contractor call out to rectify damage costing at least £800. Footage from this camera will help with staff training and identification of causes.</p> <p>This camera could also be used to monitor the levels of recycling materials in the process hall. This prevents staff needing to enter the hall and so reducing risks.</p> <p>This camera works in combination with BEC 10 to provide a detailed level of cover for the entire hall.</p>
--------	----------------------	--------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

BEC 12	Dome, Internal. Mounted on bracket.	Process hall viewing Carbon Monoxide alarm panel.	The feed from this camera will allow viewing of the live CO level within the process hall. This will prevent the need for staff to enter the hall with unknown levels of CO present after an alarm activation. Entering the hall in those conditions would pose a significant safety risk.
BEC 13	Dome, External post mounted.	Main site entrance.	<p>This camera will record any one entering/ exiting the BEC site; either invited or not and so will act as a deterrent to anyone entering our site without permission.</p> <p>Detailed signage will be installed on the main fence to BEC informing visitors of CCTV management details.</p>
BEC 14	Motorised lens. External. Corner of existing building, above plant room.	Looking down side elevation towards workshop and lorry wash.	<p>Camera used for crime prevention and detection. The area covered by this camera is a secure area and so only employees or contractors should be caught by the CCTV.</p> <p>This camera would record anyone trying to access the main building via the LGF external door, anyone trying to access the workshop and any safety issues regarding the lorry wash pit. The workshop has had two presumed breaks in with in the last twelve months. The current camera/ system, was not detailed/ controllable enough to capture the incident.</p>



			<p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues around the lorry wash pit and site traffic speed. The camera will not be used to mitigate our responsibility for Health &amp; Safety but will be used to educate and train.</p> <p>This camera will help protect the valuable council assets (buildings/ vehicles / plant).</p>
BEC 15	Fixed external. Facing plant room.	Covers external area of plant room and fuel tanks.	<p>Camera used for crime prevention and detection. The area covered by this camera is a secure area and so only employees or contractors should be caught by the CCTV.</p> <p>The plant room and fuel tanks are very sensitive areas from a safety point of view. Any unauthorised access or dangerous behaviour could have severe consequences. Any poor practises will be used to inform staff training.</p>
BEC 16	Fixed, external.	Side of building, facing main site electrical supply box and additional parking spaces.	<p>The electrical supply box is a very sensitive areas from a safety point of view. Any unauthorised access or dangerous behaviour could have severe consequences. Any poor practises will be used to inform staff training.</p>

			<p>Camera used for crime prevention and detection. Monitoring parking areas will reduce insurance claims and encourage good behaviour; reducing the number of door strike incidents.</p> <p>This camera will capture members of the public heading to Saunders Yard. Clear signage will be required to inform visitors of the CCTV system details and data controller.</p>
BEC 17	Fixed, external.	Placed to cover the yard.	<p>Camera used for crime prevention and detection. The area covered by this camera is a secure area and so only employees or contractors should be caught by the CCTV.</p> <p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues around the works yard and site traffic speed. The camera will not be used to mitigate our responsibility for Health &amp; Safety but will be used to educate and train.</p> <p>This camera will help protect the valuable council assets (buildings/ vehicles / plant). This camera will be positioned to capture issues with staff causing damage to the large sectional doors to the process hall, and so</p>



			<p>will offer a second view as per BEC 10 and BEC 11. Training will be given on bad practise.</p>
BEC 18	<p>Motorised lens. External. Post on rear boundary of works yard.</p>	<p>Covers transfer hall and W&amp;R office.</p>	<p>Camera used for crime prevention and detection. The area covered by this camera is a secure area and so only employees or contractors should be caught by the CCTV.</p> <p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues around the lorry wash pit: where one potentially serious accident has occurred in the last 12 months and also safety issues associated with site traffic speed. The camera will not be used to mitigate our responsibility for Health &amp; Safety but will be used to educate, train and highlight bad practice..</p> <p>This camera will help protect the valuable council assets (buildings/ vehicles / plant). This camera will be positioned to capture issues with staff causing damage to the large sectional doors to the waste transfer hall. Training will be given on bad practice.</p> <p>This camera will be used to provide additional backup to the door access system. The access system</p>

			restricts the movement of visitors and staff to key areas of BEC. This camera will detect unauthorised attempts to access the W&R office.
BEC 19	Fixed, external.	Covers entrance to yard by Saunders Yard.	<p>Camera used for crime prevention and detection. This camera will detect unauthorised attempts to access the W&amp;R yard via gate.</p> <p>This camera will capture anyone using the road leading to Saunders Yard; either invited or not and so will act as a deterrent to anyone entering our site without permission.</p> <p>Signage on the main entrance will make it clear that recording is taking place and who the data holder is.</p>
BEC 20	Fixed, external.	Covers lorry pressure wash area to rear of yard.	This camera was originally installed due to a number of staff safety issues in this area due to misuse of equipment and safety issues. The frequency of incidents has greatly reduced since the installation.



BEC 21	Motorised lens. External. High level on post.	Looking at over flow carpark.	<p>Camera used for crime prevention and detection. Monitoring parking areas will reduce insurance claims and encourage good behaviour; reducing the number of door strike incidents.</p> <p>A camera in this location would also encourage good behaviour of staff and visitors in respect to safety issues and site traffic speed.</p> <p>The angle of visions will need to be limited in order to avoid accidental capture of images from the Saunders Yard businesses.</p>
--------	--------------------------------------------------	-------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

CCTV Camera Schedule for North Devon Council site; Lynton House, Barnstaple.

Schedule to be read in conjunction with site plans.

Camera Reference	Camera style/ Location	Picture View	Justification
------------------	------------------------	--------------	---------------

LH 1	Fixed Dome, Internal.	Looking at staff entrance from North Walk.	<p>Camera used for crime prevention and detection. This camera would record anyone trying to access the staff only area of main building via the staff entrance door. This camera adds to the general security of the building and reinforces the security offered by the door access system.</p> <p>This camera will catch any one entering/ exiting the LH via this door; either invited or not and so will act as a deterrent to anyone entering our building without permission. It will reduce or at least highlight cases that 'tail gating' into the building has occurred. Tail gating impacts on building security and has a potential to lead to data breaches.</p> <p>CCTV in operation signage to be installed on the exterior of this door.</p>
LH 2	Fixed Dome, Internal.	Coverage for ground floor stairwell. Covering entry into the secure area of the building from reception.	<p>Camera used for crime prevention and detection. This camera would record anyone trying to access the main building via the reception door. This camera adds to the general security of the building and backs up the door access system. It will reduce or at least highlight cases that 'tail gating' into the building has occurred.</p>

			<p>There is a potential for recording member of the public entering LH. Black out or restriction panel may need to be added to avoid recording entry to the DDA public toilet. Clear signage to be installed in the court yard informing visitor and staff of the CCTV details.</p>
LH 3	Fixed Dome, Internal.	On wall behind reception interview bay one	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p> <p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taking when disorder occurrences and provide evidence for violence and aggression risk assessments.</p>
LH 4	Fixed Dome, Internal.	On wall behind reception interview bay two	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p>



			<p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taking when disorder occurrences and provide evidence for violence and aggression risk assessments.</p>
LH 5	Fixed Dome, Internal.	On wall behind reception interview bay three	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p> <p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording</p>

			evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taking when disorder occurrences and provide evidence for violence and aggression risk assessments.
LH 6	Fixed Dome, Internal.	On wall behind reception pod	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p> <p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taking when disorder occurrences and provide evidence for violence and aggression risk assessments.</p>
LH 7	Dome, Internal. Ceiling surface mounted.	Looking towards rear entrance to LH waiting area.	Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.

			<p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taken when disorder occurrences and provide evidence for violence and aggression risk assessments.</p> <p>This camera is likely to capture images of the public walking past the rear LH doors. Screening or distortion of the image may be required. CCTV in operation signage to be installed on the exterior of this door.</p>
LH 8	Dome, Internal. Ceiling surface mounted.	Looking towards main public entrance to LH from court yard.	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p>



			<p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taking when disorder occurrences and provide evidence for violence and aggression risk assessments.</p>
LH 9	Dome, Internal. Ceiling surface mounted.	Looking towards reception area and interview bays.	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p> <p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff.</p>

			Recording will allow robust actions to be taken when disorder occurrences and provide evidence for violence and aggression risk assessments.
LH 10	Dome, Internal. Ceiling surface mounted. Sound recording.	Interview 3.	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p> <p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taken when disorder occurrences and provide evidence for violence and aggression risk assessments.</p> <p>Remote view by select managers will be permitted for this camera. Quick reaction to potentially hostile situations can be monitored. This will back up the current panic button system already in place.</p>

LH 11	Fixed Dome, Internal. Ceiling surface mounted. Sound recording.	Interview 2.	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p> <p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taken when disorder occurrences and provide evidence for violence and aggression risk assessments.</p> <p>Remote view by select managers will be permitted for this camera. Quick reaction to potentially hostile situations can be monitored. This will back up the current panic button system already in place.</p>



LH 12	Fixed Dome, Internal. Ceiling surface mounted. Sound recording.	Interview 1.	<p>Camera used for crime prevention and detection. Front of house staff deal with a range of vulnerable client on a daily basis. Issues can include mental health, drug/ alcohol dependency issues and/ or violent tendencies.</p> <p>These clients' actions can put NDC officers and the public at risk. A camera in this location would also encourage good behaviour of visitors.</p> <p>The camera will aim to support and supplement the existing staff training to deter disorder and recording evidence when it does occur. This will contribute to a reduction in disorder and so increase the safety of staff. Recording will allow robust actions to be taking when disorder occurrences and provide evidence for violence and aggression risk assessments.</p> <p>Remote view by select managers will be permitted for this camera. Quick reaction to potentially hostile situations can be monitored. This will back up the current panic button system already in place.</p>
-------	-----------------------------------------------------------------------	--------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

LH 13	Fix Dome, External.	Top of ramp from court yard. Covering court yard and entrance to counting room.	<p>Camera used for crime prevention and detection.</p> <p>This camera is located to cover the entrance to the cash counting room. This room is a sensitive area and exposes our staff to a potential risk of robbery.</p> <p>The camera will record a feed to supply evidence in case of an incident. Remote viewing of this area may also be permitted to add a layer of observation over high risk operations.</p> <p>The camera will also cover the court yard in general. There has been one theft from the court yard in the last 12 months. A camera in the location would have provided evidence to a criminal investigation. This camera would will also provide evidence of damage being caused to Council assets (vehicles/ plant/ building) and so will help in any insurance claim.</p> <p>CCTV in operation signage to be installed on the exterior of the building.</p>
-------	---------------------	---------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

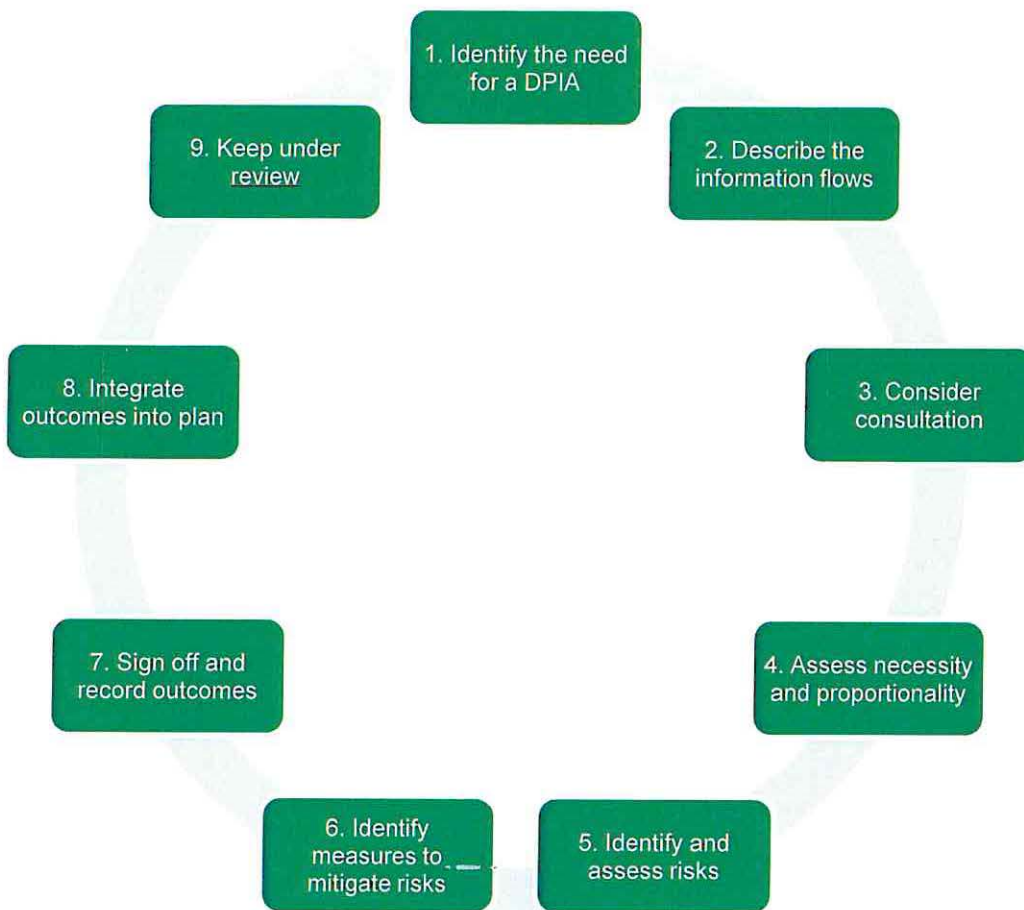
LH 14	Fix Dome, Internal.	Cottage fire exit to Castle Street.	<p>Camera used for crime prevention and detection. The area covered by this camera is a secure area and so only employees or contractors should be caught by the CCTV.</p> <p>This camera would record anyone trying to access the main building via this fire escape and also trying to access the server room located in the stair well. The server room is key NDC IT operation and so unauthorised access could have major issues.</p> <p>CCTV in operation signage to be installed on the exterior of this door.</p>
-------	---------------------	-------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------



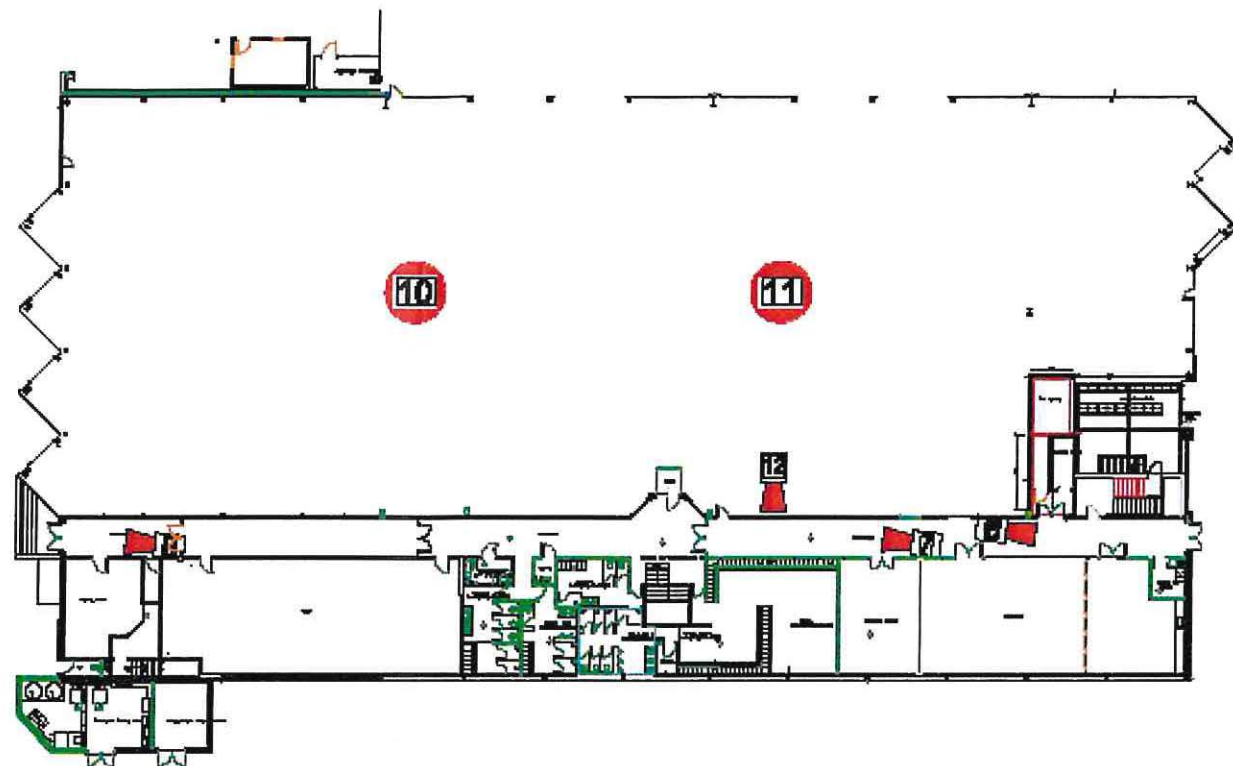


PAGE LEFT BLANK

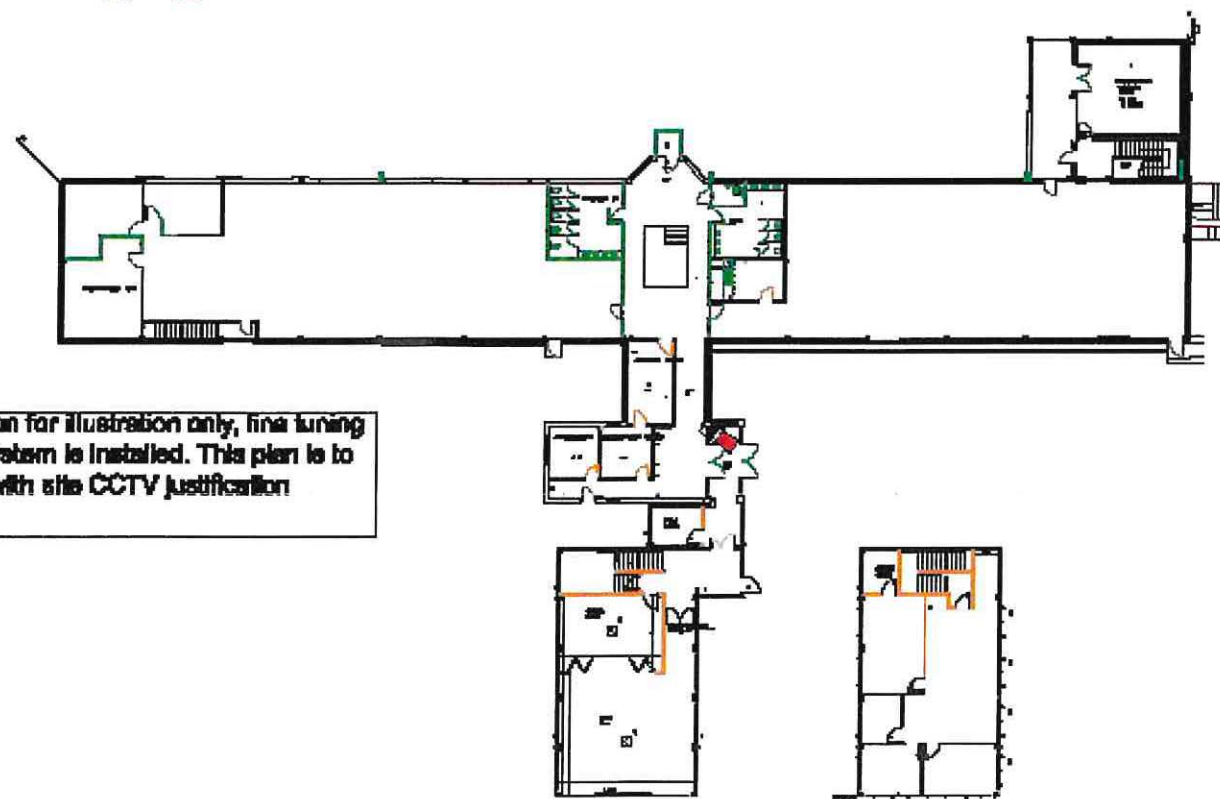
## APPENDIX ONE: STEPS IN CARRYING OUT A DPIA



Lower Ground Floor



Upper Ground Floor



Camera viewing direction for illustration only, fine tuning will be required once system is installed. This plan is to be read in conjunction with site CCTV justification document.

## COPYRIGHT

CONTRACTORS TO CHECK ALL DIMENSIONS ON SITE  
AND ANY DISCREPANCIES TO BE REPORTED  
IMMEDIATELY TO THE SURVEYOR/ENGINEER.

## NOTES

No.	Details

## REVISIONS

No.	Date	Details
-	-	-
-	-	-

North Devon Council  
PO Box 379  
Barnstaple  
Devon  
EX32 2GR

tel: 01271 227711  
e-mail: [customer.services@northdevon.gov.uk](mailto:customer.services@northdevon.gov.uk)

BEC internal CCTV plan

North Devon Council  
Property &  
Technical Services

Scale	Not to Scale
Date	22/01/2010
Drawn	CM
Checked	

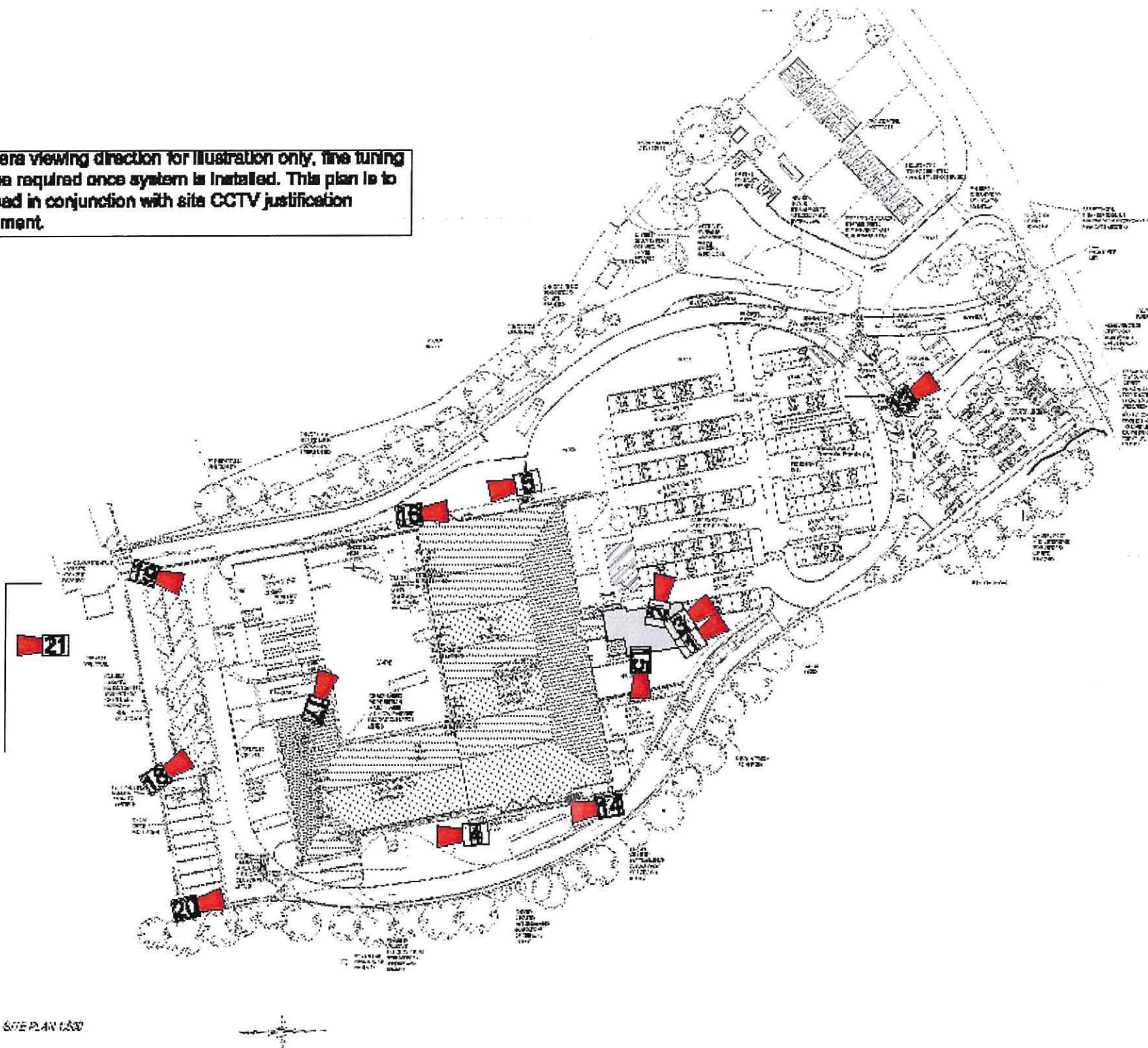


Drawing Number  
16/CM/00002/002

Rev  
1



Camera viewing direction for illustration only, fine tuning will be required once system is installed. This plan is to be read in conjunction with site CCTV justification document.



SITE PLAN (A3)

**COPYRIGHT**

CONTRACTORS TO CHECK ALL DIMENSIONS ON SITE AND ANY DISCREPANCIES TO BE REPORTED IMMEDIATELY TO THE SURVEYOR/ENGINEER.

**NOTES**

No.	Details

**REVISIONS**

No.	Date	Details

North Devon Council  
PO Box 379  
Barnstaple  
Devon  
EX32 2GR

tel: 01271 287711  
e-mail: [customerservices@northdevon.gov.uk](mailto:customerservices@northdevon.gov.uk)

BEC external CCTV location

North Devon Council  
Property &  
Technical Services

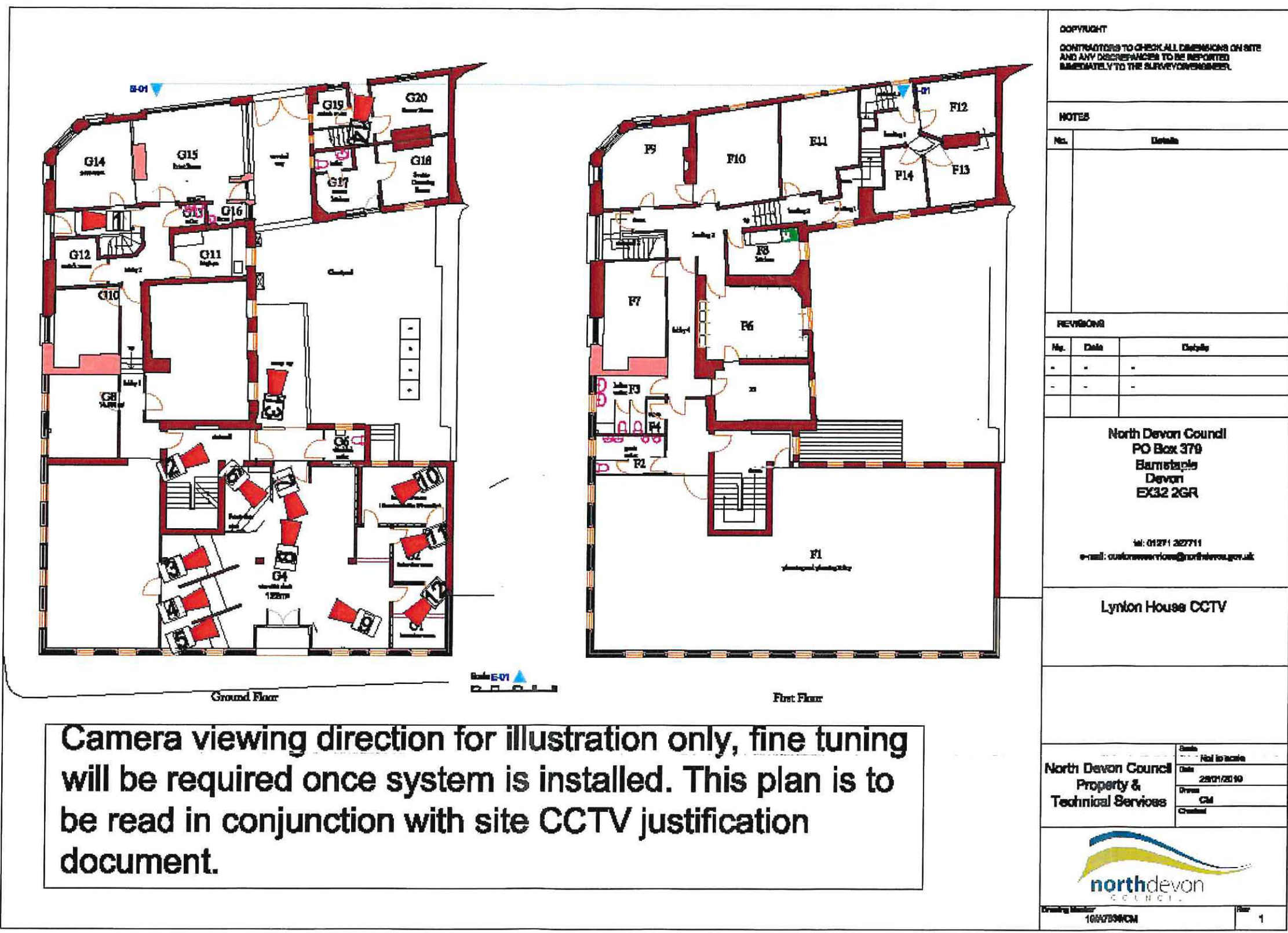
Scale	Not to Scale
Date	28/01/2010
Drawn	CM
Checked	



Drawing Number  
16ACM/PA0000001

Page  
1





COPYRIGHT  
CONTRACTORS TO CHECK ALL DIMENSIONS ON SITE  
AND ANY DISCREPANCIES TO BE REPORTED  
IMMEDIATELY TO THE SURVEYOR/ENGINEER.

NOTES

No.	Details

REVISIONS

No.	Date	Details

North Devon Council  
PO Box 379  
Barnstaple  
Devon  
EX32 2GR

tel: 01271 227711  
e-mail: [customerservices@northdevon.gov.uk](mailto:customerservices@northdevon.gov.uk)

Lynton House CCTV

North Devon Council  
Property &  
Technical Services

Scale	Not to scale
Date	28/01/2010
Drawn	CM
Checked	



Drawing Number  
100/0394CM

Rev  
1

PAGE LEFT BLANK

## APPENDIX THREE: Survey results ad analysis

CCTV SURVEY RESULTS																																
Do you own this CCTV camera? (are identified as Non-participating Business-owned Camera and/or Public House?)		In your opinion, what impact does the current CCTV have in reducing crime and disorder at NSC sites?						In your opinion, what impact does the current CCTV have in improving staff safety at NSC sites?						The CCTV upgrade project is aiming to install new cameras in different locations at NSC and Linton House. These cameras will either all continue to be these buildings, or will not be parking area at NSC. What impact do you see these cameras will have on your safety?						Do you agree that, given the location and the benefits of the proposed 1 hourly shooting CCTV in the work place, any impact of your privacy, by your images being captured in these areas, will be justified?												
Yes	No	A very positive impact	A positive impact	Fewer or a positive or negative impact	A negative impact	A very negative impact	I don't know	A very positive impact	A positive impact	Fewer or a positive or negative impact	A negative impact	A very negative impact	I don't know	A very positive impact	A positive impact	Fewer or a positive or negative impact	A negative impact	A very negative impact	I don't know	I strongly agree	I agree	I neither agree or disagree	I disagree	I strongly disagree	I don't know							
69	28	12	22	20	2	2	27	18	38	22	2	2	18	28	30	13	1	1	2	20	40	17	2	2	0							
75%	35%	57%	38%	37%	6%	1%	54%	17%	54%	22%	2%	2%	18%	38%	48%	14%	1%	2%	2%	22%	40	18%	2%	2%	0%							
		NSC						Linton House						NSC						Linton House												

[illegible]