



**SURVEILLANCE CAMERA  
COMMISSIONER**

**ico.**  
Information Commissioner's Office

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



**Project name:** Southwold and District Angling Preservation Society (SADFAPS) Gate Camera

**Data controller(s):** SADFAPS CCTV Administrator

**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 DPIA<sup>1</sup>:**

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

Potential recording of person/s and their vehicles.

**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)?

New deployment of cameras  
Processed under 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 time period; housing and community issues, etc.

Eufy Security Camera system being used on main access point of the reydon complex, to monitor and if necessary enforce the curfew as set out in the membership rule book.  
Bushnell style camera trap to monitor wildlife such as otters and water voles and entrance of unauthorised persons (on occasions)

<sup>1</sup> <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?

Only data that will be collected will be images of persons faces and vehicle registration numbers. Only in the event that access has been gained during the curfew hours. This may include people from all age groups.

Data collection will be video imagery for a shorty duration (max60s) trigered by motion detection. Private property will be blocked to ensure invasion of privacy is not breached.

Collection will be on the Eufy app on an end to end encrypted device conforming to ISO27001.

Data storage should only occur if membership rules have been broken.

Camera traps will collect imagery on a local SD card and reviewed weekly.

**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.

SADFAPS committee have agreed that the elected CCTV administrator (by officers) and Head water baliff will have access to App to view any stored footage.

If a breach of the rules have occurred then he will notify any rule breaches to the chairman of which data will be shared to those above to identify person/s involved.

On rare occassions it maybe nessesary to include other baliffs and committee members to assist with identifaction of individuals.

**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 checked="" type="checkbox"/> Stand-alone cameras    | <input type="checkbox"/> Redeployable CCTV                |
| <input type="checkbox"/> Other (please specify)            |   |

(Eufy Security)  
Busnell style Camera traps.

**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.

Capture will occur on Eufy security system via motion detection. Then stored on Eufy security app for authorised users to view. At which a decision will be made wether to notify the Chairman of the society, to contact individual to persue the issue of the curfew rule being broken. Once the issue has been resolved the data will be removed from the app by authorised user.  
Mobile camera footage will be reviewed weekly, if any footage is recorded then matters will be identified and dealt with. The footage will be deleted withing 14 days of the issue having been dealt with.

**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.

Recording via security app/locally on SD card. Audio recording disabled.

**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)

**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)

Viewed also by Head Water baliff and Chairman should an incident arise.  
On rare occasions committee members and baliffs may have to view the footage to help with identification of individuals.

## Consultation

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

<b>Stakeholder consulted</b>	<b>Consultation method</b>	<b>Views raised</b>	<b>Measures taken</b>
SADFAPs Comittee	Via Zoom Meeting 06/07/2023	Comittee in agreement that the camera will benefit the enforcment of the society rules. One concern was that positioning of camera will need to ensure neighboring property isnt recorded.	Privacy Zone will be installed to protect privacy of neighbours.

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## 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.

Protection of Complex security/enforcement of membership rules.  
Curfew to include closed season.

**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.

Signage installed prior to recording zone stating 'CCTV in operation past this point to maintain fishery complex security' and signage beneath camera stating ' Warning CCTV in operation to maintain fishery complex security' Fishery newsletter will be released with this notice in also and any queries to contact the chairman for further information.

**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?

Timer set up to only record/activate during curfew hours. Reduction of site enteries/exits in curfew hours.

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

No fixed period, untill matters arising have been resolved.  
Footage will be deleted withing 14 days of the issue having been dealt with



## 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)

**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?

Eufy Security is awarded with ISO27001 to meet and exceed privacy laws as per their website. Bushnells cameras to be positioned so that access cannot be gained and local storage be password protected.

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

Any requests will be brought up in an emergency committee meeting / notification via email and a decision whether to release the footage relating to them will be released at that point

**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.

The only other option would be for person/s to voluntarily man the gate during the curfew hours which is not reasonably practicable.  
Camera operation will only during varying curfew hours as opposed to continuously.

**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.

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
Only risk is a data leak, leaking facial images, and images of their cars.	Remote, possible or probable Remote	Minimal, significant or severe Minimal	Low, medium or high Low

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

## Address the risks

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

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

<b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk</b>			
<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved?</b>
Access to security camera cloud only available on 2 phones.	Eliminated reduced accepted Reduced	Low medium high Low	Yes/no Yes
Deletion of footage every 2 weeks. As unable to automatically delete any recorded footage.	Reduced	Low	Yes

Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
	Eliminated reduced accepted	Low medium high	Yes/no

## 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.

<b>Item</b>	<b>Name/date</b>	<b>Notes</b>
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion.
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.
DPO advice provided by:		DPO should advise on compliance and whether processing can proceed.
Summary of DPO advice		
DPO advice accepted or overruled by: (specify role/title)		If overruled, you must explain your reasons.
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons.
Comments:		

Date and version control: 19 May 2020  
v.4

This DPIA will be kept under review by:		The DPO should also review ongoing compliance with DPIA.
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## APPENDIX ONE

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

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

Location type	Camera types used	Amount	Recording type	Monitoring	Assessment of use of equipment (mitigations or justifications)
Main Gate	Eufy Starlight Camera	1	During Curfew Hours	During Curfew hours	To enforce club rule, survey of members, this seems to be well received. Very little invasion of privacy.
Lake Entrances	Bushnell style camera trap	Up to 4	During Curfew hours	When required during fishing hours	To enforce club rule, survey of members, this seems to be well received. Very little invasion of privacy.

## APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



## APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

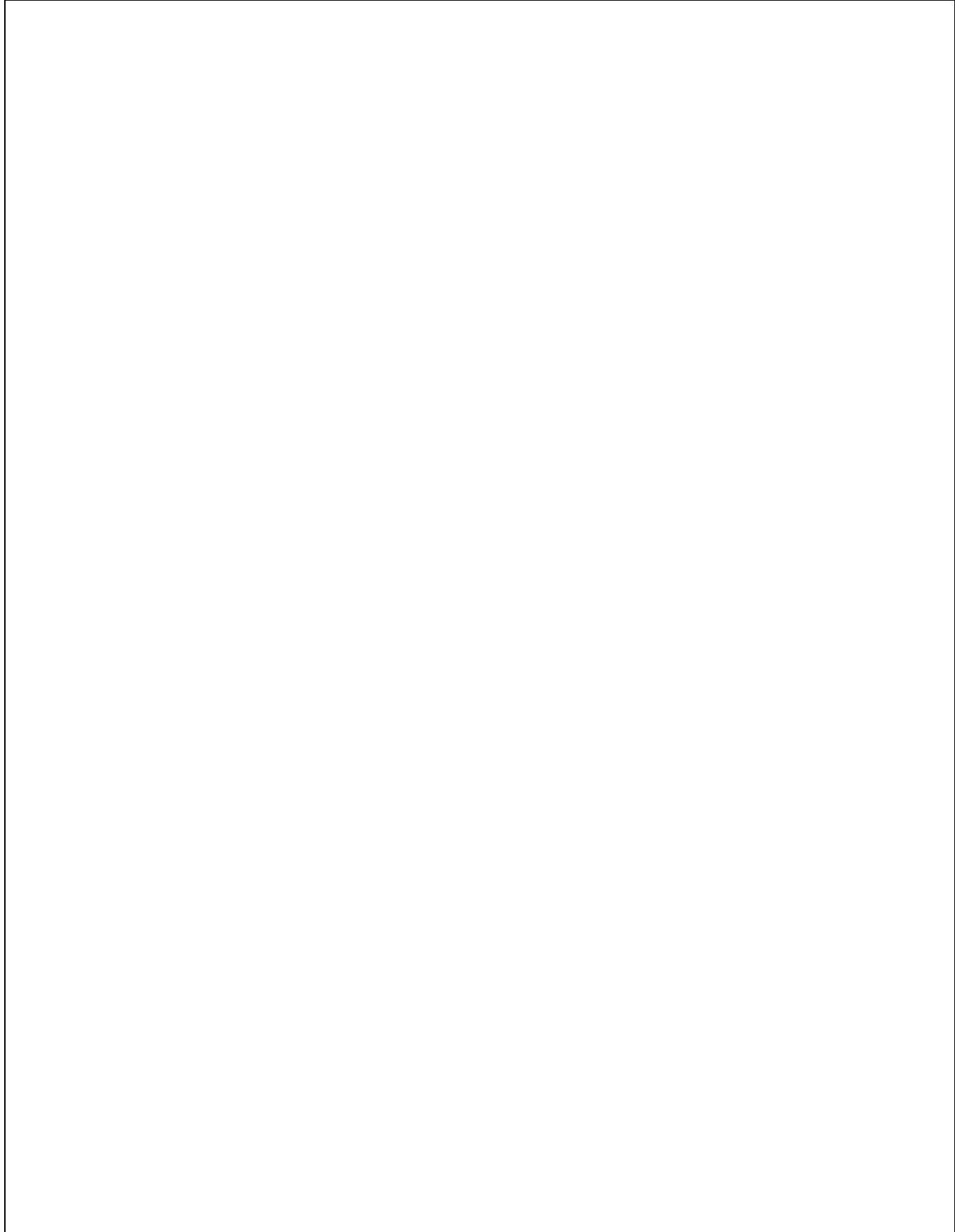
Use this risk matrix to determine your score. This will highlight the risk factors associated with each site or functionality.

### Matrix Example:

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

## NOTES

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