

# Data Protection Impact Assessment

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## Step 1: Identify the need for a DPIA

### **Explain project aims and what type of processing it involves.**

Sandwell Council's CCTV control room manages and monitors over 500 cameras that are used to monitor high rise blocks of flats and surrounding areas as well as town centres. This involves the recording and processing of large amounts of personal data such as CCTV images, as such there is a requirement for this DPIA to be completed to identify and minimise any risks associated with this task.

The council's CCTV systems will be used for the purposes of;

- Improving the perception of safety amongst the public.
- Assisting in the detection & prevention of crime & / or breaches of tenancy conditions.
- Facilitating the apprehension, prosecution and management of offenders in relation to crime, public order and / or breaches of tenancy conditions.
- Deterring, discouraging and reducing the incidence of crime, disorder and relevant aspects of anti- social behaviour including environmental crime.
- Assisting in the management of Town Centres and public spaces in the borough

## Step 2: Describe the processing

### **Describe the nature of the processing:**

The CCTV collection and storage system utilised in the control room - Synergy Pro is an industry recognised recording, storage and viewing platform that meets all legislative requirements in terms of data retention, security and evidential requirements

Camera home positions are set and monitored frequently, specific camera tasking is in place in line with our operational requirements.

A RIPA procedure is in place to ensure only approved requests for directed surveillance are carried out once all requirements have been met. A data disclosure procedure is in place and monitored as is a Subject Access Request procedure.

We have taken account of any impact on privacy by adhering to regulation and legislation laid out in our code of practice and our operational requirements that can be found as appendices to our code of practice

Incidents captured on CCTV are regularly reviewed to ensure correct camera use, outputs forwarded to relevant agencies for action where required and outputs are reviewed on a monthly basis to assist with camera tasking and resource requirements to meet objectives.

Any request to remove evidence from the Control Room will only be granted by authorised personnel on provision of the correct paperwork/consent forms. Requests can only be made under the following circumstances;

- Police enquiries - for the purposes of crime investigation
- Relevant officers of SMBC for the purpose of any investigation relating to tenancy management, anti-social behaviour or enforcement proceedings
- Any legal obligation for access under data protection legislation

The release of any images will be in accordance with our Code of Practice and any relevant regulation or legislation. Data integrity shall be maintained at all times by processing all information via the systems within the control room and operational instruction. The control room will operate in accordance with relevant legislation, internal procedure and in line with relevant British Standards.

**Describe the scope of the processing:**

The council's CCTV cameras monitor several of our public spaces on a regular basis and images are captured and recorded.

All images that are recorded are kept for 31 days after which they will be automatically overwritten. Any incident that is monitored and created by our operators will be saved to an evidence locker and protected for a maximum period of 12 months, after which time these will also be overwritten.

Objects to be observed will mainly be individuals who may carry out ASB, be a risk to tenants and / or property, to be looking to carry out or take part in any criminal activity or those breaching their tenancy conditions.

Other targets would include vehicles – abandoned or dumped, causing obstruction to emergency services or posing a danger to others, council owned properties and buildings with attention being paid to – the physical security / wellbeing of any such buildings, anything that is likely to cause a Health and Safety risk to public or tenants. Other targets would be- anything that poses a risk to life/property.

Sandwell council's CCTV control room has CCTV that covers 27 of its high-rise blocks and adjacent areas as well as 2 town Centre schemes in West Bromwich and Wednesbury. CCTV is also monitored across a housing estate at Friar Park, Wednesbury and 2 local shopping centres in Princes End, Tipton and Redwood Road, West Bromwich. The location that houses the CCTV control room is also monitored – Roway Lane Oldbury.

SMBC also operate a number of deployable cameras across the borough in response to operational need and in line with the purposes detailed in this document.

Requests for deployment will be made to a designated officer who will consider each request ensuring the criteria for deployment is met. All requests, responses, deployment reasons and outcomes will be recorded centrally for audit purposes.

Some of these cameras will have the facility to read number plates and this information in tandem with other captured images will be used for the purposes detailed in this document.

Clear signage is in place at all locations with contact details.

Monitored CCTV locations.

Location	Address	Town
Addenbrooke Court	Southbank Road	Cradley
Wesley Court	Southbank Road	Cradley
Willow Close [x5 low rise]	Willow Close	Cradley
Elm Tree Close [x4 low rise]	Elm Tree Close	Cradley
Pear Tree Lane [x4 low rise]	Pear Tree Lane	Cradley
Riddins Enterprise Centre	Applewood Grove	Cradley
Applewood Grove [x2 low rise]	Applewood Grove	Cradley
Sherwood House [low rise]	Applewood Grove	Cradley
Darley House	Wallace Close	Oldbury
Roway Lane Offices	Roway Lane	Oldbury
Alfred Gunn House	Thompson Gardens	Oldbury
Lancaster House	Oldbury Road	Oldbury
Harry Price House	Hartlebury Road	Oldbury
Broadmeade	Pavilion Avenue	Oldbury
Hackwood House	Hartlebury Road	Oldbury
Wallace House	Badsey Road	Oldbury
Selby House [low rise]	Wallace Close	Oldbury
Alston House	Wallace Close	Oldbury
Radnall House [low rise]	Wallace Close	Oldbury
Moorlands Court	Uplands Avenue	Rowley Regis
St. Giles Court	Uplands Avenue	Rowley Regis
Ashcroft	Windmill Lane	Smethwick
Birchcroft	Windmill Lane	Smethwick
Elmcroft	Windmill Lane	Smethwick
Bearwood High Street	Bearwood	Smethwick
Nelson House	Upper Church Lane	Tipton
Princess End	High Street	Tipton
Friar Park estate	Friar Park	Wednesbury
Wednesbury Town Centre	High Street	Wednesbury
West Bromwich Town Centre	High Street	West Bromwich
Greenford House	Maria Street	West Bromwich
Kenrick House	Green Street	West Bromwich
Meadow Avenue Blocks 1, 2, 3	Meadow Avenue	West Bromwich
Mountford House	Maria Street	West Bromwich
Lissimore House	Maria Street	West Bromwich
McCauley House	Glover Street	West Bromwich
Neale House	Glover Street	West Bromwich
Beaconview House	Beaconview Road	West Bromwich
Beaconview Road	Beaconview Road	West Bromwich
Wyndmill Crescent	Beaconview Road	West Bromwich
Broome House	Beaconview Road	West Bromwich
Sheepcote House	Beaconview Road	West Bromwich
Stanton House	Beaconview Road	West Bromwich
Yew Tree	Redwood Road	West Bromwich

**Describe the context of the processing:**

Images are remotely monitored from the council's control room. Full details of our CCTV systems, aims and objectives are available in our code of practice that can be found on our website along with this document.

Members of the public are made aware of CCTV by way of clear signage that is prominently displayed at each site meaning the public have an expectation they may be monitored in those areas.

Our code of practice also clearly lays out our Subject Access Request process should they wish to request images we may have captured of them. Our complaints process is also detailed within this document.

CCTV is operated in line with all relevant regulation and legislation and systems are maintained regularly.

At this time we are not aware of any public concerns around the council's use of CCTV and in the main feedback is that it is largely supported.

**Describe the purposes of the processing:**

We aim to monitor and detect incidents of ASB, Criminal activity, health and safety risks, damage/risk to buildings and threats to public safety with the purpose of sharing that information with the agency most appropriate to take action and deal with our reports.

We anticipate the benefits of providing surveillance over not providing surveillance to be;

- Increased public safety
- Increased perception of public safety
- Actions taken and successful outputs through the use of CCTV evidence
- To be one of the tools that helps to decrease ASB/low level crime
- Cameras to act as a deterrent to crime and ASB

## Step 3: Consultation process

### **Consider how to consult with relevant stakeholders:**

CCTV systems have been in place for a number of years, all relevant consultations carried out at the time of installation. Further consultations took place following previous reviews and restructure of the service, all relevant stakeholders being involved at the time. Stakeholders continue to be involved in information sharing and tasking of cameras.

Various stakeholders and partners visit the control room on a regular basis to share information and intelligence to ensure the CCTV system is being used to its optimum level

Control room staff will attend regular meetings with colleagues and partners and will share information and intelligence to ensure the CCTV system is being used to its optimum level and to share outputs.

We also engage with tenants and resident's groups as well as elected members who represent the people of Sandwell, information shared helps advise on tasking and best use of CCTV.

The public have access to our Subject Access Request process, complaints process and on-line information to keep them informed as to how CCTV is used. Contact numbers are shared, and comments and feedback are encouraged

Consultation would be carried out in the event of any major changes to the system

## Step 4: Assess necessity and proportionality

### **Describe compliance and proportionality measures**

CCTV continues to be a proportionate response to meet stated objectives. CCTV is just one of a range of tools that are used in managing ASB and Crime and measures are in place to ensure its proper use. CCTV use conforms to the Information and Surveillance Commissioners codes of practice, relevant legislation including the Data Protection Act, Protection of Freedoms Act, Human Rights Act and Human Rights act as well as British Standards governing how CCTV control rooms are set up and used.

The control room has been assessed and accredited against these requirements by the National Security Inspectorate [NSI] and will be reviewed annually to ensure ongoing compliance.

Our legal basis's for collecting data are the Crime and Disorder Act for the purposes of preventing or detecting crime and/or assisting with the apprehension or prosecution of offenders. The Anti-Social Behaviour Crime and Policing act for the purposes of managing Anti-Social Behaviour and the Housing Act for the purpose of managing tenancies. We will also release footage under the Cleaner Neighbourhoods and Environment Act.

Data quality is assured by way of internal processes and practices that ensure compliance with any relevant regulation and legislation. The control room is staffed by Control Room Operators directly employed by SMBC in a permanent capacity and staff are trained to BTEC Control Room Operators standards and are licensed by the S.I.A [Security Industry Authority] The integrity & efficiency of staff employed by SMBC to operate the scheme will be achieved through effective recruitment, selection, training & management.

The systems are in operation, monitored & recorded for 24 hours each day, 365 days of the year and responsive maintenance contract is in place that ensures CCTV related faults are rectified within 5 working days.

Control Room Supervisors employed by SMBC will undertake regular checks of systems & its operators, including regular checks of the Control Room footage that has been stored & its contents. Supervisors will also monitor all data released from the control room to ensure protocols have been observed and followed. The Control Room may also be subject to audit by SMBC Quality Assurance officers and or NSI assessors. SMBC also has an appointed Data Controller who oversees our responsibilities as processors or administrators.

## Step 5: Identify assess and mitigate risks

**Describe source of risk and nature of potential impact on individuals.**  
Include associated compliance and corporate risks as necessary.

Potential risks may include, improper use of systems, unauthorised use of images, unintentional release of images or breach of regulation and legislation

These risks are mitigated by having robust operational procedures in place. The control room operates to clear assignment instructions that refer to legislation and regulatory requirements.

Corporate policies and procedures are in also in place. Training relevant to the control room is carried out annually, staff are briefed on a regular basis and we meet the requirements of the SIA with all control room staff being licensed.

The control room also operates a robust performance management program to ensure staff are meeting their obligations- legal and otherwise.

There are clear policies in relation to who can have access to stored information and how it can be requested and released, all staff are fully trained in relation to data retention and data release, regular briefings and one to one sessions with staff ensure this is always refreshed and up to date.

Management and system checks are carried out on a regular basis, reports are generated from the CCTV system which give a record of what has been released from the system. This is checked against the disclosure requests to make sure our procedures are being followed.

## Step 6: Sign off and approval

<b>Item</b>	<b>Name</b>	<b>Date</b>
DPIA reviewed and updated	CCTV control room manager	April 2024