

Beech Parish Council

Data Protection Impact Assessments on ASW surveillance camera systems

Adopted 18th November 2024

Agenda item 13. b) Minute reference 24.114 b)



Project name: Beech AutoSpeedWatch

Data controller(s): Parish Clerk and Responsible Cllr

This DPIA template should be completed with reference to the guidance provided by the Surveillance Camera Commissioner and the ICO. It will help you to identify whether the use of surveillance cameras is appropriate for the problem you wish to address, assess the risks attached to your project and form a record of your decision making.

1. Identify why your deployment of surveillance cameras requires a DPIA¹:

Ref Article 35(3) Public Monitoring of Vehicles at

- **Beech Kings Hill**
- **Beech Mid Village**
- **Beech East**

- | | |
|---|---|
| <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) |

Speed Cameras

¹

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)?

Ongoing Speed Surveillance cameras 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.

There are a number of locations in Beech where speeding is unacceptable to the Parishioners of Beech. The Parish council as part of its Road Safety initiative has acquired and deployed cameras in order to make commercial organisations aware of their vehicles speeding in our village and to lobby to local and county police force to take positive action to prevent speeding.

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?

There is no Personal data captured. Volunteers capture and verify VRN's and Commercial vehicle data signage this will be advised to the coordinator and Parish Clerk either via e-mail or Secure WhatsApp group. Vehicles with no Tax will be reported to the DVLA via the gov.uk DVLA page.

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.

VRN data will be provided to the Local Police authorities.

Tax, MoT data may be provided to the DVLA.

The Parish Clerk is authorised to advise commercial vehicle owners who display they contact data on their vehicles that their vehicles are speeding in our village. This contact is via a predetermined process agreed and authorised by the Parish Council.

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

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

Fixed position, fixed field-of-view, speed activated camera

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.

The Parish Council has licensed the software and associated communication system from AutoSpeedWatch Limited who are responsible for compliance of communication and on-line data storage. An authorised co-ordinator may extract data for further analysis, and this will be Password secured. No data containing VRNs will be published by the Parish council and VRN data will only be used:

- a. to advise Commercial Vehicle owners of which signed vehicles are committing speeding offenses in Beech.
- b. To advise the police force of offending vehicles.

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.

Individual still images are recorded to AutoSpeedWatch server. No audio.

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)

By direct access to images on the AutoSpeedWatch server via known Police Registered access.

Commercial vehicles will be notified through a Parish Council approved process

Beech Parish Council - Process for addressing Frequent Speedsters
using ASW Intelligence

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)

Non-Image data associated with images used to verify the VRN, Location, Data and time sent to police.

VRN's send to owners of signed vehicles to advise them of the offenses committed in those vehicles, as per Beech Parish Council - Process for addressing Frequent Speedsters using ASW Intelligence

Consultation

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

Stakeholder consulted	Consultation method	Views raised	Measures taken
Parishioners	Representation by elected councillors for the parish	None	None
Property owners of any property within field-of-view camera	Councillor/Property owner conversation	None	None

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.

Parish & community duty to work with the police in the management of road safety risks as part of existing or new Community Speedwatch schemes. The SCC commissioner has confirmed that such systems, correctly applied, for support of the police are acceptable.

Beech has been deemed as too dangerous to operate a Community Speedwatch scheme. As such we are working with the police, the district council and the Highway authority as to the best ways to reduce the road safety risks to people on the roads through the village.

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.

Use of Informed Consent Signage, each containing contact information.

Signage is approved by Hampshire Highways. Monthly reports are published on the Parish Website.

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?

The system is fixed position and triggers capture only for the purposes of recording speeding vehicles. This function cannot be changed by any user, nor can the unit be redeployed for any other function. Should Roadside Units get stolen they are reported as such and can be disabled by Autospeedwatch Limited, in such a way that they cannot be re-enabled independently.

Proportion of speeding is logged and system can be disabled when the local authority review assess that it is no longer needed.

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

No more than 365 days according to company data retention policy. Records can be deleted before this. Data is automatically deleted. Once deleted there is no recovery.

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)

Automated script removes images and associated data at 365 days. Meta data (count of records deleted) is kept indefinitely.

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?

Each roadside unit camera built by design to be secure from unlawful / malicious attack. Communications between subsystem on devices encoded. Images not stored locally, but transmitted in encrypted form for storage on Autospeedwatch Limited centralised server. Data only accessible in to registered and approved users, who cannot re-write, edit or manipulate data by virtue of inherent permissions. The lead user (coordinator role) is assigned by this parish and is responsible for managing operational use. That coordinator can add other members (validators and readers) with limited access rights to assist in operation. Each member must agree to the Autospeedwatch Limited terms and conditions of usage to gain access.

Each member of the Beech ASW group signs up to the Beech Parish Council AutoSpeedWatch Camera Policy

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.

By reference to the parish policy document. As no images where a subject appears are kept there should be no image release mechanism required. The policy describes a process for how enquiries are handled.

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.

Beech Parish Community Speed Watch (CSW) Group was disbanded, and the Hampshire Police deemed there were no suitable safe sites for a CSW group to operate from. The Parish Council conducted a Road Speed and Volume project in 2021 with the Hampshire Highways Special project team. That concluded that 3 ASW and a SID should be located in each direction of travel along the 2 km stretch from Kings Hill to the A339. The monitoring system has been operational since Spring 2022. It has reduced speeding from 20% of vehicles to just 3 %. In addition to this Hampshire County Council has reviewed the Road signage and implemented on On-Road Footpath. We are currently using the system to see if that has resulted in further reduction of speed. We are liaising with Hampshire Police to address the frequent speedsters who currently represent the majority of vehicles still speeding.

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)

Copies of the Beech Parish Council AutoSpeedWatch Camera Policy can be obtained from

Mrs Louisa Thomson – Parish Clerk

Old Stables, Wield Road, Medstead, Hampshire, GU34 5NJ

Or you can send the clerk an email at clerk@beechpc.com requesting a copy.

Identify the risks

Identify and evaluate the inherent risks to the rights and freedoms of individuals relating to this surveillance camera system. Consider, for example, how long will recordings be retained? Will they be shared? What are the expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective? Could it interfere with other human rights and freedoms such as those of conscience and religion, expression or association. Is there a risk of function creep? Assess both the likelihood and the severity of any impact on individuals.

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Homes/Dwellings – viewing of personal habitation space	Remote, possible or probable Remote	Minimal, significant or severe Minimal	Low, medium or high Very Low
Capture of faces within image frame of rear view of vehicle.	Remote	Minimal	Very Low
Storage of image data longer than necessary	Remote	Minimal	Very Low
Copying or distribution of images by users	Possible	Minimal	Very Low
	Remote, possible or probable Possible	Minimal, significant or severe Minimal	Low, medium or high Low

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.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk			
Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
Request disabling of cameras where privacy invasion risk is changed and considered inappropriate	Eliminated reduced accepted Eliminated	Low medium high Low	Yes/no Yes
Reposition camera	Reduced	Medium	Yes
	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.

Item	Name/date	Notes
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: Last Reviewed <date> next review on or before <date>		
This DPIA will be kept under review by: <named officer>		The DPO should also review ongoing compliance with DPIA.

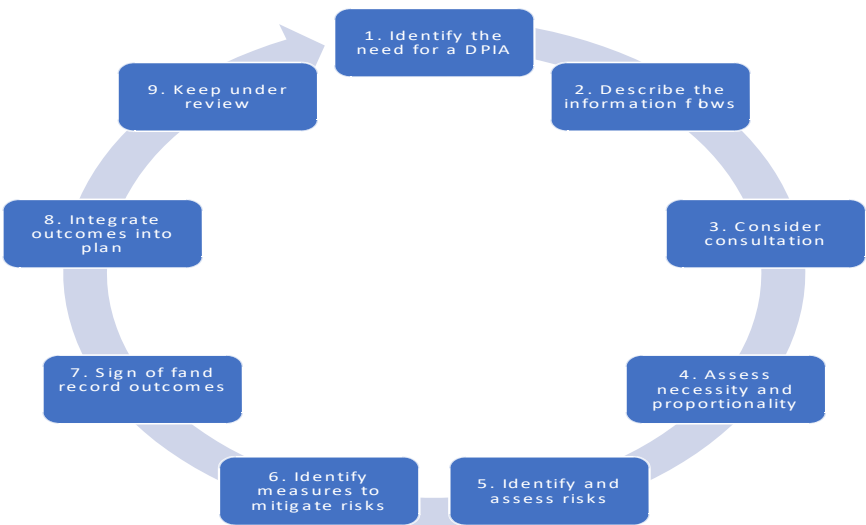
APPENDIX ONE

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	Monitoring	Assessment of use of equipment (mitigations or justifications)
Roadside @ Beech Kings Hill, Beech Mid Village, Beach East	ASWRU01	6	Daylight hours only,	Only speeding offences, reviewed by registered community speedwatch team member at a later time.	No specific mitigations.

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)	SID	ASW(6)							

NOTES

Date Completed:

Date Approved by Council: 18th November 2024