

Owner:	Campus Manager
Revision:	2
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University of Wolverhampton CCTV Privacy Impact Assessment (City Campus)

Identify the Need for a PIA

A need for a PIA was identified as the CCTV system captures images of individuals in both public space, and on University property, and to comply with the following:

- Data Protection Act (1998)
- Regulation of Investigatory Powers Act (2000)
- Protection of Freedoms Act (2012)

The scheme aims to detect, prevent and reduce the incidence of:

- Criminal Activity
- Offences against the individual
- Vandalism

And to provide evidence for:

- Internal disciplinary hearings (staff and student).
- Police
- HM Customs and Excise
- Health and Safety Executive.

Individuals have the right to data containing images of themselves, this will only be released in accordance with current legislation at the time of the request.

Information Flow

All University of Wolverhampton CCTV cameras operate 24 hours a day, images are recorded onto a computer hard drive and retained for (as far as is reasonable practicable) 30 days, this is automatically overwritten by new data as the hard drive fills up.

If images are required for passing to a third party, these will be archived (this is kept on the same hard drive as live footage), the requirement to retain this is reviewed after 90 days, if no requirement is identified, footage is deleted. If there may be a requirement to retain the images, this time period will be extended in 90 day increments.

External agencies may be issued with footage, this is carried out in accordance with the University policies and procedures and complies with the data protection act, all agencies must sign a University data release form which is kept on file.

Internal University departments who may require images for evidential purposes, each adhere to a procedure where they sign for receipt of images, these are then stored in a secure location within each department. A review date is set by each department, following review; this date may be extended for purposes of further investigation. If there is no requirement to retain images any further, the images are destroyed.

Consultation

In consultation with a variety of stakeholders, we have highlighted areas of concern and have met these concerns as a priority. By far the main concern was walking from the Library or Town Centre, to the halls of residence or University car parks, this area has been covered by the placement of several overt cameras which cover most of this journey.

The issue of secure storage has been addressed with both the University IT department and the installation engineers to ensure that as far as is reasonably practical, all data is on a secure separate VLAN network, and all hard drives are in a secure restricted access location.

The Students Union was consulted over privacy concerns, however, it was decided that the safety of the student body was paramount and that the insignificant impact on privacy was minimal.

Records are not available of each project consultation prior to installation of all cameras'.

Identify the Privacy Related Risks

Privacy Issue	Risk to Individuals	Compliance Risk	Organisation/Corporate Risk
System excessive without consideration of alternative measures.	Surveillance methods may be an unjustified intrusion on their privacy, resulting in acute embarrassment and an unwillingness to cooperate.	Non-compliance with the DPA or other legislation can lead to sanctions, fines and reputational damage.	Public distrust about how information is used can damage the University's reputation. Loss of faith within the student body resulting in a reduction of new students.
Excessive information held on individuals	People may be concerned about the risks of identification or disclosure of information.	Non-compliance with the DPA or other legislation can lead to sanctions, fines and reputational damage.	Public distrust about how information is used can damage the University's reputation. Loss of faith within the student body resulting in a reduction of new students.
Images used for purposes other than those that the system was designed for.	Images may be used for external media organisations.	Non-compliance with the DPA or other legislation can lead to sanctions, fines and reputational damage.	Public distrust about how information is used can damage the University's reputation. Loss of faith within the student body resulting in a reduction of new students.
Insecure storage of images, insufficient procedures in place to manage information flow.	Insecure storage may result in unauthorised access to images	Risk of non-compliance with both the DPA and HRA	Loss of institutional reputation, sanctions imposed by the ICO.
Possible BWV risk not relevant to CCTV. Potential for subjects to be in a state of undress whilst recording takes place.	Surveillance methods may be an unjustified intrusion on their privacy, resulting in acute embarrassment and an unwillingness to cooperate.	Non-compliance with the DPA or other legislation can lead to sanctions, fines and reputational damage.	Potential for accusations of voyeurism and image misuse resulting in adverse publicity for the University.

Solutions

Risk	Solution	Result	Evaluation
System excessive without consideration of alternative measures.	<p>Consultation with stakeholders.</p> <p>Alternatives looked at to ensure a requirement for CCTV</p>	<p>Agreement reached on level of cover.</p> <p>Alternatives such as improved lighting was looked at, however, due to the close proximity to the City centre crime may occur even during daylight hours. In cooperation with the Police, the Students Union have devised a "Safer Walking Route" when travelling from the city centre to halls of residence.</p>	<p>Only area's "at most risk" are covered, no unnecessary addition's to the system have been made.</p> <p>Alternatives such a lighting in car parks was discussed, however all recorded "theft from vehicle" crime is during daylight hours.</p>
Excessive information held on individuals	<p>System installed overwrites data resulting in approximately 30 days of footage retained at any given time in the archives.</p> <p>Implement a robust "use and destroy" strategy, where images are retained no longer than necessary.</p>	<p>Data stored in accordance with the DPA (1998) and Surveillance Camera Commissioners guidelines.</p> <p>Images are destroyed following any investigation associated with them.</p>	<p>Images are kept no longer than necessary.</p>
Images used for purposes other than those that the system was designed for.	All system users licensed by the SIA in CCTV(PSS)	All users aware of the regulations surrounding the use of the University CCTV system and trained in the subject area covering the Data Protection Act (1998)	Reduction in the likelihood of misuse occurring.
Insecure storage of images, insufficient procedures in place to manage information flow.	Implementation of robust data handling procedures.	Fully traceable and auditable system of work in place for handling data.	Only authorised personnel have legitimate access to images.
<p>Possible BWV risk not relevant to CCTV.</p> <p>Potential for subjects to be in a state of undress whilst recording takes place.</p>	Robust procedures surrounding recording video when this possibility exists implemented with instruction to announce that video and audio recordings are taking place.	Possibility of recording images of individuals in a state of undress dramatically reduced as far as is reasonably practical without the loss of evidential recordings.	Reduction in the likelihood of images of partially or fully undressed individuals being recorded.

Campus Specific Considerations

Issue	Solution	Result	Evaluation
Camera outside North Road residences overlooking private dwellings	Apply privacy mask to affected dwellings.	View to dwellings now blocked	Issue resolved
PTZ Cameras around the University residential dwellings overlooking windows to student accommodation.	Apply privacy mask to affected dwellings.	View to dwellings now blocked	Issue resolved

Responsible Person Contact Details

Below are the contact details of the person to whom questions relating to this PIA are to be addressed to:

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