

Driffield Town Council Annual CCTV Data Protection Privacy Impact Assessment

Date of Review	18 th February 2021	Responsible Body	Driffield Town Council CCTV Committee
Contact details of Authorised Representative	Claire Binnington (Town Clerk) Tel: 01377 254 160 Email: townclerk@driffieldtowncouncil.gov.uk	Next Review due by	February 2022

SECTION ONE: Surveillance Camera Code of Practice

Requirement	Review of Compliance	Action Required/ Recommendations
<p>1] Use of a surveillance camera must always be for a lawful and specified purpose, which is in pursuit of a legitimate aim and necessary to meet an identified pressing need. (Article 6, GDPR, 2018)</p> <p><i>(Principle 1: Surveillance Camera Commission Code of Practice)</i></p> <p>What were the reasons for installing and using the CCTV Surveillance System?</p>	<p>The use of the system shall be for the purpose of:-</p> <p>a) Providing Driffield Town Council (DTC) and Humberside Police with evidence to take criminal and civil action in the Courts;</p> <p>b) Reducing the fear of crime and providing reassurance to the public;</p> <p>c) Providing assistance in the detection and prevention of crime (including countering terrorism);</p> <p>d) Assisting with the maintenance of public order;</p> <p>e) Deterring or reducing the incidence of vandalism, graffiti, and other environmental crime;</p> <p>f) Deterring persons from committing crimes and to enhance the opportunities for detecting those</p>	<p>a] Data about the number of times and reasons that Humberside Police access the images (data) will be obtained using the updated CCTV access register.</p> <p>This will be reported back to DTC at the CCTV Committee meetings on a monthly basis.</p> <p>It would also be useful to explore whether the Police could report back on outcomes where CCTV data has successfully assisted an investigation or been used as evidence in criminal proceedings. This would provide further evidence of the necessity, legitimacy and positive benefits of the system.</p> <p>(Please also see CCTV Committee minutes on the Council Website).</p> <p>b] A repeat Public consultation has recently been undertaken (2020). It is vital that public opinion</p>

Requirement	Review of Compliance	Action Required/ Recommendations
	<p>who do;</p> <p>g) Improving the safety and security of residents, visitors and the business community;</p> <p>h) Discouraging anti-social behaviour including alcohol and drug-related elements;</p> <p>i) To assist the Police in efficient allocation of limited resources.</p>	<p>regarding public space CCTV surveillance systems and their significance to parishioners is sought and taken into account. Public consultation about the use of CCTV is an important part of GDPR compliance and the Data Protection Privacy Impact Assessment (DPPIA).</p> <p>The results of this recent consultation are:</p> <p>80.24% of people who completed the survey thought that the use of CCTV Surveillance was important. (41.5% = very important 38.74% = important)</p> <p>3.95% thought that CCTV surveillance was not important.</p> <p>Only 2.77% thought CCTV unnecessary.</p> <p>13.04 % expressed that they had no opinion.</p> <p>i] Please refer to Section 1a</p>
<p>1a] What are the benefits to be gained from the system, Who will benefit and can CCTV realistically deliver those benefits?</p> <p><i>(Principle 1: Surveillance Camera Commission Code</i></p>	<p>Residents, visitors and businesses will benefit from improved public safety, and reductions in crime and the fear of crime.</p> <p>CCTV is a useful tool in preventing and deterring</p>	

Requirement	Review of Compliance	Action Required/ Recommendations
<i>of Practice)</i>	<p>individuals from committing crime.</p> <p>CCTV is a useful tool in detecting crimes, and the perpetrators of it. Using CCTV can significantly reduce the time and cost on the Police service in investigating allegations.</p> <p>Driffield is a relatively small market town with a population of around 14,000. Therefore there are only a small number of Police personnel serving the community. CCTV helps the Police in their role by enabling them to allocate limited resources more effectively. For example, if an incident or crime reported the Police are able to access the system and assess the situation in order to provide an appropriate response and/or request additional support and resources as needed.</p> <p>There may also be instances where false reports and/or allegations are made. CCTV can be useful in disproving some allegations because it captures actual events and is not influenced by individual interpretation, or differences in individual perception.</p> <p>For accurate and up to date crime statistics in and around the areas covered by CCTV, including detailed crime maps, please go to https://www.police.uk/humberside/22/crime/stats/</p>	

1 b] Were there any specific concerns or incidents that led to the installation of the CCTV Surveillance System and which it continues to help	For accurate and up to date crime Statistics in and around the areas covered by CCTV, including detailed crime maps, please go to	
--	---	--

Requirement	Review of Compliance	Action Required/ Recommendations
<p>address?</p> <p><i>(Principle 1: Surveillance Camera Commission Code of Practice)</i></p>	<p>https://www.police.uk/humberside/22/crime/stats/</p> <p>The system was installed initially in 1994 by a local Crime Prevention Panel. This committee comprised local business owners and residents and was set up in response to rising concerns about the level of crime in and around Driffield.</p> <p>For example one business owner repeatedly had their premises vandalised and their shop windows deliberately broken. Since the installation of CCTV these incidents stopped.</p> <p>Driffield Town Council inherited responsibility for the system in 2006 because of funding and financial considerations and to save on costs.</p> <p>DTC set up a CCTV committee who coordinated public fundraising initiatives to finance the system's maintenance and upgrades.</p> <p>Funding for the system and its maintenance is and has been obtained from a variety of sources including grants from the Horace Taylor Trust and Dewhirst Trust, the Save our Streets campaign (Middle Street North residents and business owners) through various fundraising events and grants from Driffield Town Council.</p>	

<p>1 c] Has the justification for the use of CCTV as opposed to other methods been considered?</p> <p><i>(Principle 1: Surveillance Camera Commission Code of Practice)</i></p>	<p>Yes, as per Section One, parts 1a and 2.</p> <p>CCTV is considered to be the most effective method of achieving the aims outlined in section 1 a.</p>	
---	--	--

Requirement	Review of Compliance	Action Required/ Recommendations
	<p>Other methods such as using security fencing would be inappropriate, impractical and intrusive as the town centre is an open public area accessible to all members of the community and these would be restrictive to people's civil liberties such as the right to freedom of movement.</p> <p>Improved lighting has been installed in some areas of the town centre. However bright street lighting in town centres where people are also residents can be invasive and intrusive.</p> <p>Therefore, where improved lighting has been installed to assist in meeting the aims outlined in section 1a, its use was carefully considered to balance these aims against the level of intrusion for town centre residents.</p>	

<p>1d] Is there a legally sound basis for the use of CCTV and is that use proportionate?</p> <p><i>(Principle 1: Surveillance Camera Commission Code of Practice)</i></p>	<p>The cameras are used as a proportionate response to crime, disorder and in promoting wider community safety. The introduction of the Crime and Disorder Act 1998 placed a direct responsibility on local authorities to combat crime and anti-social behaviour through section 17.</p> <p>Section 17 was intended to provide the impetus for authorities to consider how their services might fulfil these responsibilities.</p>	
<p>1e] Have any other measures been implemented to</p>	<p>Yes – improved Street Lighting (see also Section</p>	

Requirement	Review of Compliance	Action Required/ Recommendations
<p>help deal with the issues and aims that the CCTV system was installed to address?</p>	<p>1, parts 1c & 2).</p>	

<p>2] The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular review to ensure its use remains justified.</p> <p>What measures (if any) are in place to minimise any privacy risks.</p> <p><i>(Principle 2: Surveillance Camera Commission Code of Practice)</i></p>	<p>There is general consensus amongst Driffield Town Councillors and the CCTV committee that other solutions such as security fencing and improved lighting could meet the purposes outlined in Section One, 1, but would be impractical and more intrusive and restrictive to civil liberties than CCTV.</p> <p>Therefore, for Driffield town centre areas CCTV is considered to be the most effective, appropriate and practical solution for meeting the purposes outlined.</p> <p>This is particularly so given the usefulness of CCTV in deterring crime and in investigating and prosecuting criminal and public disorder offences.</p> <p>Where it was considered appropriate to install improved street lighting, CCTV works in conjunction with it.</p> <p>As a result of the DPPIA that was carried out for each individual CCTV camera a number of measures have been put in place to minimise privacy risks, including repositioning of some cameras and installing privacy masks on others.</p>	<p>A comprehensive Data Protection Privacy Impact Assessment (DPPIA) of the whole CCTV system and each individual CCTV camera has been completed.</p> <p>As a result of this some cameras have been repositioned and privacy masks have been applied to areas where there may be a potential for privacy intrusion to minimise any privacy risks.</p>
---	--	---

Requirement	Review of Compliance	Action Required/ Recommendations
-------------	----------------------	----------------------------------

<p>3] There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints</p> <p>How is the use of CCTV communicated to those under surveillance?</p> <p><i>(Principle 3: Surveillance Camera Commission Code of Practice)</i></p>	<p>There is appropriate signage at all the main entrances to the town informing people that CCTV is in operation, who the system owners are and providing contact details for further information.</p> <p>There are also a number of appropriate signs in place. Signage is placed at the perimeter of the town on all the Driffield Town signs, informing anyone who enters Driffield that the town is covered by CCTV. Signs are also placed at both entrances of North End Park and at regular intervals through the town centre where the majority of the CCTV cameras are placed. Signs are placed wherever their position does not pose a risk to public health and safety. The signage clearly states the purposes of the surveillance system, the name of the system operator and their contact details.</p> <p>Information about the CCTV system is available on the Council Website.</p>	<p>The CCTV Code of Conduct and DPPIA will be published on the Council Website.</p>
<p>4] There must be clear responsibility for all surveillance camera system activities including images and information collected, held and used.</p> <p><i>(Principle 4: Surveillance Camera Commission Code of Practice)</i></p>	<p>Details of responsibilities are documented in the CCTV Code of Practice.</p>	<p>The CCTV Code of Conduct and DPPIA will be published on the Council Website.</p>
<p>5] Clear rules, policies and procedures must be in place before a surveillance camera</p>	<p>Driffield Town Council inherited ownership of and responsibility for the CCTV system as</p>	<p>The Code of Practice clearly identifies roles and responsibilities</p>

Requirement	Review of Compliance	Action Required/ Recommendations
<p>system is used, and these must be communicated to all who need to comply with them.</p> <p>What are the policies and procedures for the use of the system and how are these communicated to system operators?</p> <p>Eg, operational procedures</p> <p>What documentation is completed when images are viewed or downloaded?</p> <p><i>(Principle 5: Surveillance Camera Commission Code of Practice)</i></p>	<p>described in section 1b. Because it has inherited an existing system DTC has conducted a Data Protection Privacy Impact Assessment (DPPIA) to ensure that the system complies with current legal requirements and ensure that any required changes to maintain compliance are identified and implemented.</p> <p>The DPPIA will be reviewed annually.</p> <p>The system is operated according to the CCTV Code of Practice.</p> <p>The system user manual is available on the system access database for operators to refer to.</p> <p>At the point that images are viewed the CCTV data is the responsibility of Driffield Town Council who is the data controller.</p> <p>Once images are downloaded for investigation and evidential purposes, Humberside Police Force become the data controller for the downloaded images and the documentation about and security of that data is managed as per Police Force policies and procedures.</p> <p>A CCTV access log is completed by system users whenever they access the CCTV images, either to view them in order to investigate an incident or report or to download them for evidential purposes. This has recently has been reviewed and updated.</p>	<p>The CCTV Code of Practice has been given to the system users (Humberside Police) and explained.</p> <p>CCTV access log has recently been reviewed and updated</p>

Requirement	Review of Compliance	Action Required/ Recommendations
	<p>This is reported back to the system owners (data controller) on a monthly basis so that informed decisions about the use of the system and data and its effectiveness can be made and the security and use of the system can be monitored and audited.</p>	
<p>5a] What training do CCTV operators receive? In GDPR? In Operating and accessing the system?</p>	<p>There are only two authorised Humberside Police Force employees who are authorised to have access to the CCTV footage at Driffield Police Station. VSS have demonstrated how to access and use the system to authorised users and an operator’s manual is available on the system.</p> <p>All Humberside Police Force employees receive general training and updates in GDPR although this related to all types of data that are subject to GDPR and not specifically or directly related to CCTV data.</p> <p>The system is password protected so only authorised personnel can log on to the CCTV system and access CCTV data.</p>	

<p>6] No more images and information should be stored than that which is strictly required for the stated purpose of a surveillance camera system, and such images and information should be deleted once their purposes have been discharged.</p>	<p>This is specified in the Driffield Town Council CCTV Code of Conduct</p>	<p>The CCTV Code of Conduct and DPPIA will be published on the Council Website.</p>
--	---	---

Requirement	Review of Compliance	Action Required/ Recommendations
<p>What are the retention policies and how is footage deleted?</p> <p><i>(Principle 6: Surveillance Camera Commission Code of Practice)</i></p>		
<p>7] Access to retained images information should be restricted and there must be clearly defined procedures on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement purposes.</p> <p><i>(Principle 7: Surveillance Camera Commission Code of Practice)</i></p>	<p>This is specified in the Driffield Town Council CCTV Code of Conduct.</p> <p>The system is password protected so only authorised personnel can log on to the CCTV system and access CCTV data.</p>	<p>The CCTV Code of Conduct and DPPIA will be published on the Council Website.</p>

<p>8] Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose and work to meet and maintain those standards</p> <p><i>(Principle 8: Surveillance Camera Commission Code of Practice)</i></p>	<p>As per Section One, part 5. The system user manual is available on the system access database for operators to refer to.</p>	
<p>9] Surveillance camera system images and information should be subject to appropriate security measures to safeguard against</p>	<p>Access to the CCTV monitor and CCTV data at Driffield Police station is strictly controlled.</p>	

Requirement	Review of Compliance	Action Required/ Recommendations
--------------------	-----------------------------	---

<p>unauthorised access and use.</p> <p>What security measures are in place?</p> <p><i>(Principle 9: Surveillance Camera Commission Code of Practice)</i></p>	<p>The monitor is in a room inside the Police Station and only authorised personnel can enter the inside of the Police Station via a security door.</p> <p>Only two Humberside Police Force employees are authorised to access and use the system at the Police Station.</p> <p>The system is password protected so only authorised personnel can log on to the CCTV system and access CCTV data.</p> <p>The router which receives the data from the CCTV cameras at the Police Station is in a separate locked cupboard so it cannot be tampered with.</p> <p>At the Council Office the recorder and monitor are in a secure cupboard. The offices are securely locked at night, alarmed and monitored by CCTV.</p>	<p>The security of the system at the Council Office is being reviewed by the CCTV committee to ensure that present security arrangements are sufficient and effective.</p>
<p>10] There should be effective review and audit mechanisms to ensure legal requirements, policies and standards are complied with in practice, and regular reports should be published.</p> <p>What audit procedures are in place?</p> <p><i>(Principle 10: Surveillance Camera Commission</i></p>	<p>This DPPIA was conducted in November 2019 and will be reviewed, updated and audited yearly.</p> <p>The Humberside Police CCTV Access log is communicated back to the CCTV committee on a monthly basis.</p> <p>The Service Level Agreement between Driffield</p>	<p>DPPIA will be published on the Council website.</p> <p>Updated CCTV Access register has been implemented.</p> <p>A Service Level Agreement between DTC and Humberside Police is currently being formulated.</p>

Requirement	Review of Compliance	Action Required/ Recommendations
<i>Code of Practice)</i>	<p>Town Council and Humberside Police Force should be reviewed and renewed annually.</p> <p>The CCTV Code of Practice should be Reviewed and updated annually.</p>	
<p>11] When the use of a surveillance camera system is in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the aim of processing images and information of evidential value.</p> <p><i>(Principle 11: Surveillance Camera Commission Code of Practice)</i></p>	<p>The system has been installed in the public interest to meet an identified need to deter, prevent and detect crime.</p> <p>There is a planned regular maintenance contract in place to ensure the quality and integrity of the system and its images to ensure they are of evidential value.</p>	
<p>12] What are the views of those under surveillance?</p> <p>How do you know? What consultation processes have been undertaken/ are in place?</p> <p><i>(Principle 2: Surveillance Camera Commission Code of Practice)</i></p>	<p>The CCTV system was financed by a public fundraising initiative undertaken by Driffield residents who were concerned about crime and safety within the town and wanted the system installing to help address these issues.</p> <p>A civic survey was conducted in both 2011 and 2013 and administered to all households in the Driffield Town Council area. Amongst other issues of civic concern, the survey asked for resident's views about CCTV surveillance.</p> <p>The general feeling is that people who are not involved in crime are happy to be in an area that is monitored by CCTV cameras. There are some members of society both law abiding and those</p>	<p>DTC has recently repeated a comprehensive civic survey which included residents' opinions and views about CCTV.</p> <p>See Section One: 1.</p>

Requirement	Review of Compliance	Action Required/ Recommendations
	<p>who are not, who have issues with being in areas covered by CCTV cameras. By abiding with current legislation, we aim to show that the CCTV system is only used for crime reduction/detection purposes and those activities that assist the public and are in the public interest.</p> <p>The civic survey is being conducted again in 2020 and will contain questions about the CCTV system to ascertain the views of local residents and ensure that residents are still satisfied and comfortable about public space CCTV surveillance.</p> <p>The Council's complaints procedure is published on the website. Any complaints or comments regarding the CCTV system are considered by and addressed by the CCTV committee.</p>	

SECTION TWO: Data Protection Privacy Impact Assessment (DPPIA)

Requirement	Review of Compliance	Action Required/ Recommendations
-------------	----------------------	----------------------------------

<p>1] Where are the real-time images from the cameras displayed?</p>	<p>Images are not displayed and/or monitored on a 24 hour, 365 day per year basis.</p> <p>Monitors are located at DTC Council Offices and Driffield Police Station. Unless there is a specific need to access the system the monitors are switched off and images are only accessed by authorised personnel in response to specific incidents, requirements and concerns.</p> <p>Any real-time images that are displayed in the secure control room environment are presented on a computer monitor. There is one monitor located at the operator work station at the police station enabling them to monitor incidents or download data for investigation and evidential purposes. There is one monitor at Driffield Town Council Offices.</p> <p>Access to the system and monitors is restricted to authorised personnel and password protected.</p>	
<p>2] Who has operational access and ability to control the CCTV cameras?</p>	<p>Only authorised employees of Humberside Police have access to the CCTV control room and have full operational access including moving of PTZ cameras.</p> <p>Authorised DTC employees have access at the Council Offices.</p> <p>Authorised VSS employees have supervised access to the system when undertaking regular</p>	<p>Clearly outlined in the Code of Practice</p>

Requirement	Review of Compliance	Action Required/ Recommendations
--------------------	-----------------------------	---

	<p>checks as part of routine maintenance.</p> <p>The system is password protected so only authorised personnel can log on to the CCTV system and access CCTV data.</p>	
3] How is information collected?	<p>The system relays on street digital video pictures, which are transmitted from cameras positioned in various locations throughout Driffield. The transmissions are received at Driffield Police Station and the DTC Office. Some cameras are fixed on a particular scene; others are equipped with pan, tilt and zoom facilities allowing free movement through 360 degrees.</p> <p>Some cameras are equipped with ANPR (automatic number plate recognition), please refer to section 2, part 6.</p>	
4] Where is the information collected from?	<p>Public places, car parks and buildings, the town centre and as a consequence the exterior of premises, shops and businesses, Cross Hill car park and North End Park</p>	
5] From whom/what is the information collected?	<p>General public in monitored areas</p> <p>Target individuals or activities (suspicious persons/incidents)</p> <p>*Vehicles/ Registration marks (ANPR).</p>	
6] How is information used?	<p>To search for vulnerable or missing persons</p> <p>To search for wanted persons</p> <p>Recorded data may be disclosed to authorised</p>	

Requirement	Review of Compliance	Action Required/ Recommendations
<p><i>*(Principle 12: Surveillance Camera Commission Code of Practice)</i></p>	<p>agencies to support post incident investigation by, including law enforcement agencies for the purpose of investigating or prosecuting crime.</p> <p>Recorded data may be disclosed to authorised agencies to provide intelligence.</p> <p>Humberside Police Force have only a small group of core employees at Driffield Police Station. Live access to CCTV images in response to specific incidents assists in the reallocation of addition Police personnel/resources when this is needed.</p> <p>*ANPR can be used to compare against vehicle reference databases to assist in Police investigations (for example, missing person investigations or if the driver of a particular vehicle is suspected of being involved in or witness to a crime). However, in Driffield this technology is not in continuous use and is only employed in response to a specific incident or concern.</p> <p>NB: ANPR technology is in continuous use in some areas of the country and users can automatically check all vehicle registration marks against national databases. This is <u>NOT</u> the case with Driffield ANPR cameras.</p>	
7] How are the images recorded?	Electronically on local recorders.	
8] Where are the images recorded?	Driffield Police Station – no audio Driffield Town Council Office – no audio	

9] Where are recorded images stored?	Driffield Police Station and Driffield Town Council Office	
--------------------------------------	--	--

Requirement	Review of Compliance	Action Required/ Recommendations
10] What measures are in place to control access to the recorded images?	Data is encrypted. Recorders and monitors are located in secure locations. Access to images is restricted to authorised personnel and password protected.	
11] Who has access to the recorded images?	As per the DTC CCTV Code of Conduct and DTC and Humberside Police Service Level Agreement. Authorised VSS employees have supervised access to the system when undertaking regular checks as part of routine maintenance.	
12] How is access gained to the recorded images?	Data can only be accessed by authorised persons at Driffield Town Council Office and Driffield Police Station and viewed on the monitors in these locations. Information can be uploaded to electronic storage devices at these locations.	
13] How long are the images retained?	31 days unless required and downloaded for the purpose of investigating or prosecuting crime or in response to a legitimate subject access request.	
14] How are the images deleted?	Automatic system over write.	
15] When the data is downloaded or copied for release to a third party how is information recorded?	Images can be copied to a CD, DVD or Digital recording media.	
16] What processes are in place to ensure that data protection responsibilities are understood by persons receiving the data?	Staff Training as per Section One, 5 a.	

<p>17] Are images of identifiable individuals required or could the scheme use other technology not capable of identifying individuals?</p>	<p>The system must be capable of identifying individuals, as footage from the system will be used in both criminal and civil court cases.</p> <p>If the system did not have this capability it would not be fit for purpose.</p>	
---	--	--

Requirement	Review of Compliance	Action Required/ Recommendations
<p>18] Will the particular equipment/system of work in use deliver the desired benefits now and remain suitable in the future?</p>	<p>Yes. Driffield Town Council's working methods are unlikely to change. The currently service whereby cameras are only viewed after a report has been made to the Police, will remain as is for the foreseeable future and will be delivered by Driffield Town Council and Humberside Police.</p> <p>Driffield Town Council will continue to explore and seek out new technologies and how these might help us to improve on service delivery, enhance security and increase privacy</p>	

<p>19] What future demands may arise for wider use of images and how will you address these?</p>	<p>Legislation can and does change. We will comply with all future regulations placed upon us.</p> <p>CCTV images are not released to 3rd parties unless the CCTV Code of Conduct and proper Police procedure (as determined by the Home Office) is followed and a legitimate basis for its release is clearly established.</p> <p>3rd party requests may be received from various sources including (but not restricted to) emergency services, solicitors, insurance companies and law enforcement agencies such as HMRC, DWP and the National Crime Agency.</p> <p>Requests for data are made in writing to the Council using the Subject Access Requests Forms which are available on the Council Website.</p> <p>All requests for data are considered on an individual, case by case basis, taking into</p>	
--	--	--

Requirement	Review of Compliance	Action Required/ Recommendations
	<p>account individual rights, data protection legislation, privacy and the wider public interest.</p>	
<p>20] Can a data subject request access to footage?</p>	<p>Yes. The Data Subject Access Request procedure and forms are available on the Council website and/or individuals can contact Driffield Town Council directly.</p> <p>The procedure is also documented in the CCTV Code of Conduct.</p>	

<p>21] What organisations will have access to CCTV images? Who will take legal responsibility under the Data Protection Act?</p>	<p>Humberside Police are the main users of the CCTV system, however, other Police Forces and law enforcement agencies such as The National Crime Agency along with Humberside Fire And Rescue Service would be granted access to the system if a legitimate request is received and correct procedures are followed.</p> <p>See also Section 2, part 19.</p> <p>Driffield Town Council is the Data Controller at the point of images being recorded, however if any images are released to any authorised party/ organisation, then the legal data protection responsibility for the released data is transferred to the receiving organisation.</p> <p>As outlined in Section 2, parts 19 & 20, as DTC are the data controller, Data Subject Access Requests should be made in writing to the Council using the Subject Access Requests Forms which are available on the Council Website and legitimate requests are authorised by them.</p>	
--	---	--

SECTION THREE: Operational Requirements

Requirement	Review of Compliance	Action Required/ Recommendations
<p>1] Does the system meet the purpose for which it was installed?</p>	<p>On the whole yes.</p>	<p>Some adjustments were required and implemented as per the recommendations of this DPPIA.</p>

<p>2] Have any complaints been received about an individual camera or the whole/part of the system? If yes, what was the outcome?</p>	<p>One complaint was received in June 2019.</p> <p>This led to a comprehensive review of Driffield Town Council CCTV surveillance system, it's CCTV policies and procedures, an updated CCTV Code of Conduct, a Data Protection Privacy Impact Assessment (DPPIA) of the whole system and each camera in use and a Code of Practice between the Council (system owners and data controllers) and Humberside Police Force (data processors and system users) is now in force.</p> <p>One complaint of an alleged data breach was received in September 2020. Reported by DTC to the ICO. Decision to not uphold the complaint received 6th October 2020 but recommendations acted on immediately with Humberside Police.</p> <p>One complaint of alleging unlawfully processing data was received in October 2020. Humberside Police refuted the claim. (details can be sought from the clerk)</p> <p>One complaint was received in December 2020 of collectively unlawfully operating a CCTV System, colluding with Humberside Police to gather, store and process the complainant's data and breaching other's data while unlawfully processing his data. Humberside Police dealt with this complaint. (details can be sought from the clerk)</p>	
<p>3] Has the location of each camera been reviewed to ensure they remain suitable?</p>	<p>Yes, a comprehensive Data Protection Privacy Impact Assessment (DPPIA) of the whole CCTV system and each individual CCTV camera was undertaken in November 2019.</p>	<p>DPPIA to be reviewed annually.</p>

<p>4] Are there any new residential/business developments within existing areas or other public spaces that could benefit from additional Cameras/ or moving existing cameras?</p>	<p>Yes, when finances allow, a camera is to be installed in the Memorial Garden adjacent to North End Park in response to incidences of vandalism and antisocial behaviour.</p> <p>A DPPIA will be conducted to ensure this camera complies with legislation before the scheme is completed.</p> <p>No other new camera installations are planned, although upgrades to existing cameras in the</p>	<p>Some cameras have been repositioned or removed as per individual camera DPPIA.</p> <p>Cameras that have been removed due to issues with poor image quality will be replaced with higher quality cameras as funding allows.</p>
<p>Requirement</p>	<p>Review of Compliance</p>	<p>Action Required/ Recommendations</p>
	<p>scheme will be made as finances permit.</p>	
<p>5] Is there a comprehensive maintenance and cleaning regime in place?</p>	<p>Yes, there is a maintenance agreement between Driffield Town Council and VSS who installed and oversaw the development of the system. VSS complete cleaning and maintenance of existing cameras on a monthly basis.</p>	
<p>6] Is there appropriate and sufficient signage in place to warning that CCTV is in use?</p>	<p>Yes (see Section One: 3)</p>	
<p>7] Is there a Code of Practice governing the use of CCTV Surveillance?</p>	<p>Yes</p>	
<p>8] Is the Code of Practice up to date?</p>	<p>Yes. This was reviewed and ratified by Driffield Town Council CCTV Committee on 5 November 2019</p>	<p>To be reviewed annually</p>
<p>9] Is the Code of Practice accessible to both staff and the public?</p>	<p>It has been agreed with and made available to staff and system operators (Humberside Police).</p>	<p>To be published on Council Website.</p>
<p>10] Is the equipment of sufficient quality to enable images to be used as evidence in court?</p>	<p>Mostly.</p>	<p>See Section Three, part 4.</p>

11] Are there regular function checks to ensure that all equipment is operating and recording correctly and that all images are stamped with the correct date/time?

The Police operators check the data & time stamp of any downloaded images to ensure this is correct before they are taken into Police possession as per Police procedure.

Any data downloaded as evidence for use in criminal proceedings must be of a sufficient quality to satisfy Home Office standards.