CCTV – Privacy Impact Assessment

University of Worcester

Date of Assessment: 11/08/2026

Person responsible: Assistant Director – Security & Operations

---

Considerations:

1. Organisation's purpose for using CCTV and the issues the system aims to address. A. Anti-Social Behaviour, crime, violent behaviour, community safety.

2. Can CCTV technology realistically deliver these benefits?

B. In part when combined with other measures which may include but are not restricted to police response, lighting control, licencing control, community wardens, PCSO involvement, public contribution, (e.g. neighbourhood watch) etc.

3. What are the views of those under surveillance?

C. New installations, (post 2009) were installed with public consultation as part of the process. Direct consultation was restricted to residents, including businesses, ward councillors, any organisations that operated in the area such as residents' associations and social landlords.

D. Prior (than 2009) installations are inherited, and it is not known what public consultation, if any, took place. Hence these cameras are being re-assessed on the basis of current public expectations and perceptions. For example, if cameras are installed in an area where there is a vibrant nighttime economy and have been in position for many years, we will not seek public consultation but will fully assess them to ensure they are still fit for what is deemed their original purpose.

4. Have other less privacy-intrusive solutions such as improved lighting been considered?

E. Improved, (or reducing) lighting has been included in the assessment. Comments made in the event of any changes to lighting.

F. More intensive police patrolling

G. Licensing incentives, (E.g. 'Traffic Light scheme, enforcements)

H. Cameras which do not stray from the area of objectivity

I. Privacy zones on cameras

J. Changes to road layouts, (e.g. closing or restricting use of so called 'rat-runs')

5. What are the benefits to be gained by using CCTV?

K. Reduction in most crime types

L. Feeling of safety, (public confidence)

M. Deterrence of crime

N. Protection of Property, (public & private)

O. Increase in prosperity of the area, (a safer place is more likely to be patronised)

6. What are the privacy issues arising from this surveillance camera system

P. Consideration that the specific camera does not have the capability to intrude beyond that which is for its specific purpose.

Q. That private dwellings are protected from cameras having the ability to look, for example into bedroom windows or back gardens, (no ng the expectation of privacy is normally less to the frontage of a property which is continually exposed in any event).

R. Signage has to be prevalent to advise all users of the areas where CCTV is in use

7. What privacy design features will be adopted to reduce privacy intrusion.

S. Privacy zones, a) electronic as part of the cameras programming & b) physical, such as a screen attached to camera infrastructure

T. Avoiding the use of camera which have the capability to invade privacy beyond the camera's objectives, (or the turning off of such design features).

8. What organisations will be using the CCTV images and who will take legal responsibility for the data under the Data Protec on Act 2018?

U. All CCTV images are controlled under current legislation in accordance with the Data Protec on Act 2018 and all data movement is fully documented. Organisations are not limited to the police and can include other bodies with enforcement powers, (such as customs and excise and some council departments)

9. Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?

V. Cameras have been assessed to be 'fit for purpose'. For example, if a camera is being used in a park where there is no lighting or it is poor, white lighting or infra-red is deployed.

W. The criteria to enable the identification is dictated by home office recommendation, (10% detection, 25% observation, 50% recognition & 100% identification). Cameras are assessed to have the ability to meet the objectives of each of the four stages.

10. Will the CTV equipment being installed and the system work being adopted be sustainable? Is there sufficient funding for the scheme?

X. Any new installation is assessed for both compatibility with the existing system and as advanced as can be afforded but still considers the objectives. Cameras will not be specified that, (as far as can be ascertained) are likely to be obsolete or become unfit for purpose in the near future.

Y. No new installation will take place unless there is an existing revenue or identifiable revenue stream to support it.

11. Will the particular system/equipment being considered deliver the desired benefit now and remain suitable in the future?

Z. New installations are assessed to be fit for the purposes, (pressing need) for which they are being installed. (Or in the case of the older inherited cameras what it was deemed they were originally installed for).

A1. A new installation, (from individual cameras to the entire infrastructure) is assessed and risk managed by adopting 'industry standards' and the use of common platforms.

12. What future demands may arise for wider use of images and how will these be addressed?

B2. All existing cameras are assessed on the current objectives which derive from the current pressing need. As, (and if) future demands change a new assessment will take place to determine the suitability of any equipment specified.

C3. A wider use of images, (in terms of the data produced) being introduced is the ability for police to view CCTV remotely. This is being addressed with Tier 2 level agreements which document the use of all recorded data and insure legal and appropriate use.

Section 2 Human Rights Act 1998

1. Is the system established on a proper legal basis and is it operated in accordance with the law?

Comment: How the CCTV system operates is fully documented and documenta on is fully available to auditing commissioners.
The authority also publishes and distributes, (via Gateways, libraries and on its website) a public 'CCTV Code of Practice' which sets out how public space surveillance is carried out and how the data it captures is used.
This assessment includes a review of the 'CCTV Code of Practice' and will make any appropriate alterations as a consequence of changing legislation or improved working practices.

2. Is the system necessary to address a pressing need, such as public safety, crime prevention or National security?

Comment: The assessment process as is documented here is carried out to ensure that the pressing needs for the system in its entirety, groups of or individual cameras was originally introduced are still valid.
Comple on of this assessment confirms the necessity of the system to address pressing needs such as public safety, crime prevention and National Security.

3. Is it justified in the circumstances?

Comment: The severity of the circumstances will vary but this assessment seeks to determine if the use of CCTV is proportionate. (See 4 below).

4. Is it proportional to the problem that it is designed to deal with?

Comment: This is determined by the results of the assessment. However, a problem is subjective. For example, one person may find a group of 50 motorcyclists gathering on a playing field every Sunday is upsetting and feels CCTV should be employed but

others feel that as it's one day a week it doesn't worry them. Therefore, the assessment should look at using the CCTV just on the Sunday, (if at all) as it's not
mee ng its objectives the other six days of the week but is s ll recording innocent and legal users of the playing field. The assessment may also determine that measures other than CCTV could resolve the issue, such as locking the gate to the field or prohibiting motor vehicles. Thus, concluding that CCTV is not proportionate.

5. Do any of these measures discriminate against any particular section of the community?

Comment: The assessment considers all Equality & Diversity implications. Part of the PIA is public consulta on and no strata of society is excluded at any stage. Crime statistics are obtained to help determine the appropriateness of CCTV and on no occasion is race, creed or colour a deciding factor.
If a crime is being committed and recorded on CCTV it is the crime itself that is being recorded and not the perpetrator or victim.
The assessment may consider an area of high crime, (determined statistically) might benefit from CCTV, with or without other measures. That the area might be one of high crime would be one of the deciding factors and if the majority of residents were of a particular creed or colour it would have no bearing on the assessment. This also applies to areas of deprivation. The assessment considers only the pressing need and does not include deprivation as a reason to introduce CCTV.

Notes:

Using the alphabetic index as above you can match the le er to the notes.

Auditors, (i.e. those carrying out the assessment) will use the notes to ensure that element of consideration has taken place.

They will then document the consideration has taken place by writing the le er in the appropriate column.

Assessments should be published for the public but do not have to be in this format, (which is designed to ensure a proper and robust process) and can be summarised. (An example is included).

Assessments should be at least annually and kept on file for as long as the system is in use.

Assessments should be made when there is a change. You should not wait un l a year has expired since the last one. This is especially important if a camera is changed as it is often likely to be of a different type and may stray from your original objectives or become more intrusive.