DATA PROTECTION IMPACT ASSESSMENT

A Data Protection Impact Assessment (DPIA) is a process that helps an organisation identify and minimise the data protection risks of a project. **You should only complete this full DPIA where you have been told that one is required by the Information Rights Team or the Data Protection Officer.** If you have not been asked to do a full DPIA please do the pre-screen first. Search on essentials for 'DPIA' and download the DPIA pre-screen.

A DPIA is a legal requirement therefore please complete the form in as much detail as you can so the council has the necessary assurances of data protection legal compliance. Avoid technical language and jargon, and assume little prior knowledge of your subject and project by readers.

Ethics screening: If you have been advised to proceed straight to a full DPIA please complete the ethics screening at the end of this document. If you have already completed a DPIA pre-screen then the ethics screening need not be duplicated.

Project Name	**CCTV with Audio - Kings Cross Construction Skills centre**	
Project Lead and Information Asset Owner/s	Project Lead	[redacted]
	IAO name and asset	Camden Council Mark Booth Employment services manager
Summary of the project. *Outline what your project is about. Start with a general headline and then go into more detail.* E*xplain any acronyms on first use.*	Kings Cross construction Skills Centre (KXCSC) is Camden construction training and employment facility. The centre helps Camden unemployed residents form 16 and above who are eligible to work in the UK access construction training opportunities and employment in the borough. KXCSC offer a multitude of construction skills training delivered at the centre Kings cross including diploma training in multi skills, plumbing, carpentry and electrical installation. In addition to the diploma training KXCSC is an accredited test centre to deliver the construction skill certification scheme (CSCS) this is affiliated by the Construction Industry Training board CITB. As part of the new CITB requirements to deliver CSCS all tests now are **required** to be recorded with audio in addition to visual footage . The centre currently only records visual images for CCTV so an adaptation to the test room that needed Without the audio added to the room KXCSC cannot deliver the CSCS test and local residents will have to travel to another centre not in the borough to do the actual test KXCSC are required by the CITB to now record audio in addition to visual CCTV this recording is only to take place when an actual CSCS test is taking place at no other time will audio recordings take place . Clients will be made	

	aware when registering with the project that when they sit the CSCS test that their audio will be recorded, The CSCS test is taken under strict exam conditions with an invigilator in the exam room at all time
Implementation Date: *Should be at least a month to allow for assessment and any necessary steps to be undertaken*	1/04/22

Initial risk assessment: Screening questions are to do an initial risk assessment and highlight problems that need to be addressed. Answering "Yes" to any of the screening questions above represents a potential privacy/data protection/security risk factor.

If you have already completed a pre-screen, attach it to the DPIA, skip q1 and go to q2 otherwise please answer the questions below.

Q 1	Step 1: Initial Risk Assessment	Yes/No
1.1	Does the project introduce new or additional information technologies that have privacy implications? (like facial recognition, AI?)	n
1.2	Will there be large scale systematic monitoring in a publicly accessible place – like a new CCTV system	n
1.3	Will you use profiling, automated decision-making or special category data to help make decisions on someone's access to a service, opportunity or benefit?	n
1.4	Does the project involve new identifiers, re-use or existing identifiers e.g. NHS or NI number, Mosaic ref, Northgate ref, and/or will use intrusive identification or identity management processes and/or electronic linkage of personal data?	n
1.5	Might the project cause data that was previously anonymous or pseudonymised (where a code is used instead of eg names) to become identifiable ?	n
1.6	Does the project involve multiple organisations, eg public sector agencies eg joined up government initiatives, or private sector e.g. outsourced service providers/ business partners? Kings Cross construction Skills centre has a contract with the Construction Industry Training Board CITB to deliver the Construction skills certification scheme in this there is an agreement to share client data with the CITB only in terms of CSCS testing requirements no other data is ahead with CITB or any other referral partner. KXCSC has a data sharing agreement with CITB	Y
1.7	Does the project involve new processing or significantly change the way in which personal data/special categories of personal data is handled? KXCSC are required by the CITB to now record audio in addition to visual CCTV . this recording is only to take place when an actual CSCS test is taking place at no other time will audio recordings take place . Clients will be made aware when registering with the project that when they sit the CSCS test that their audio will be recorded . Clients will be asked to sign a disclaimer that they agree to this . The CSCS test is taken under strict exam conditions with an invigilator in the exam room at all time	y
1.8	Does the project involve new or significantly change handling of personal data/special categories of personal data about a large number of individuals?	n
1.9	Will data be combined, compared or matched from multiple sources?	n
1.10	Will you process biometric (finger print /facial recognition) or genetic data?	n
1.11	Will the personal data be processed out of the U.K? Eg any provers have out of UK servers?	n

1.12	Will children's personal data be processed for profiling or automated decision-making or for marketing purposes, or offering online services directly to them?	n
1.13	Does the project relate to data processing which is in any way exempt from legislative privacy protections?	n
1.14	Will personal data be processed in a way which involves tracking individuals' online or offline location or behaviour?	n
1.15	Will personal data be processed which could result in a risk of if there was a security breach? All client data is recorded on a management information system which is a locked system the only breach would if there was a cyber attack, otherwise all information is stored away and secure	n
1.16	Does the project involve systematic disclosure of personal data to, or access by, third parties that are not subject to comparable privacy regulation?	n

Step 2: What personal data is being used?										
2.1	**Is this use of personal data/special categories of personal data a new use? Or is it already happening and this is a change?**						New/Changed			
							New			
2.2	**What data will be processed/shared/viewed?**									
	Personal Data									
	Name	**Y**	Date of Birth	**Y**	Gender	**Y**	National Insurance Number	**Y**	Financial Information about the person	**N**
	Address	n	Email address	n	Telephone number	n	NHS No	N	Other eg a reference number such as Mosaic ref	N
	Other data *(Please state):*			Audio recording of speech/sounds in the exam room						
	Special Categories of Personal Data									
	Racial or ethnic origin	n	Fingerprints/ Biometrics	*N*	Religious or philosophical beliefs Political opinion					*N*
	Trade Union membership	N	Physical or mental health or condition							
	Sexual life or sexual orientation	n	Housing records Social services records	N	Tax, benefit or pension records	N	Employee/HR records			N
	Other data *(Please state):*									
2.3	Will it include data about any criminal offence committed or alleged, or criminal offence record?		No, breaching exam rules is not a criminal offence							

<table>
<tr><th colspan="4">Step 3: Describe the data processing</th></tr>
<tr><td>3.1</td><td colspan="2">Describe in as much detail what is being done with the data - how is the data being used, how it is being handled, stored and transferred/shared?</td><td>The new processing is the audio recording for CCTV footage

When taking the CSCS test clients are given a privacy notice making candidates aware that their images and audio will be recorded only for the CSCS test purposes and stored for 30 days and can be shared with the auditor for CITB in strict auditing conditions . Each CSCS test is taken under strict exam conditions with an invigilator present in the room the entire time .

All invigilators have their own CITB usernames and log ins
The CITB software has regular system updates that take place remotely .
KXCSC has a Project support officer who is the designated CITB lead who deals with all system updates and auditing queries on behalf of the council</td></tr>
<tr><td>3.2</td><td colspan="2">Explain in as much detail as possible why this is being done</td><td>The KXCSC centre is an accredited test centre of the CITB to deliver the CSCS test , tests take place to Camdern residents twice a week free of charge . The test is 45 minutes long and is taken in the CSCS test room under strict examination conditions with an invigilator present at all times

CITB requires that audio be recorded to ensure the exams operate properly with no cheating.</td></tr>
<tr><td rowspan="3">3.3</td><td colspan="2">Are you sharing the data with an external organisation or partner or are they involved in processing the data?</td><td>Data shared with CITB for CSCS test purposes only</td></tr>
<tr><td>External organisation or partner Name</td><td>Controller or Processor?</td><td>Is there an existing contract or Data Sharing Agreement between the council and the parties which covers information security and data protection ? Yes/No/In progress</td></tr>
<tr><td>CITB</td><td>Controller</td><td>This is in process with CITB</td></tr>
</table>

3.4.	**Has a data flow mapping exercise been undertaken?** **If yes, please provide a copy, if no, please undertake**	See appendix
3.5	**How will the information be processed/shared. Details eg secure file transfer**	All client data that is required is entered on an online exam system called Pearsons, this is password protected and only staff who are trained invigilators to take the CSCS test can enter this details , only these candidates are allowed into the exam room where the CCTV footage will take place and can be recorded for the CITB auditor as and when they require it within a 30 day period of taking the actual test. When CCTV footage is required from CITB in terms of a skills audit the KXCSC manager is required to email the CCTV security team to gain footage of a particular time when a test took place that the CITB require to audit , this will be sent in an encrypted file to the CITB at no point will KXCSC staff see the footage only the auditor from CITB

Step 4: Assess lawful basis, necessity, and proportionality			
4.1	**Identify Lawful Basis for processing personal data/special category /criminal data. Ask IRT for advice if needed (DPA@camden.gov.uk if you have no named Information Rights Officer advising)** **If not processing the category say N/A**		
	Personal data Article 6(1) UK GDPR condition **Article 6(1)(e) to meet** construction skill certification scheme (CSCS) affiliated by the Construction Industry Training board CITB.	**Special Category data UK GDPR Art 9 condition and DPA18 schedule condition** None required	**Criminal data UK GDPR Art 10 condition and corresponding art 6 condition** none required

4.2	**If consent is a legal basis how is it obtained? Note that in most cases consent is not the basis relied on by the council. Only use consent when Information Rights Team have advised this is appropriate**	
	Consent is not the legal basis.	
4.3	**How will you ensure data quality and data minimisation- how will you ensure the data is accurate and you are only using the minimum data to achieve your aims?** If this is covered in a pre-screen refer to the pre-screen, otherwise detail below	
	Data is checked at registration an advisor has a one to one session with the client at this point paperwork is checked to see the client come s from Camden and is eligible to register i.e age, benefit status remain to work or train , only at this point will they be eligible to sit the CSCS test .CCTV footage is kept for 30 days and only available to CITB upon request. Footage is then retrieved and sent via Camden council authorised officers.	
4.4	**Have individuals been informed about the proposed use of their data?** For example, do all the organisations/partners who will process the data (inc the council) cover this use in their Processing Notice online	Yes candidates are informed at registration stage
4.5	**Will you comply with the council's policies on to Subject Access Requests and other data subject rights? Do contracts with any processors for the council contain the council's clauses on data subject rights?**	
	YES	
4.6	**Will the processing of data include automated individual decision-making, including profiling?** If yes, please outline the profiling processes and the rights of the data subject	
	NO	
4.7	**Data Retention Period - how long will the data be kept?**	
	CCTV footage kept for 30 days	
Step 5: Information Security Process		
5.1	**On what systems will the data will be stored** *Examples of Storage include bespoke system (e.g. EPR, Emis & other clinical systems, SharePoint, data repository, Network Drives, Filing cabinet (office and location), storage area/filing room (and location) etc.*	
	CCTV system that is in place at Kings cross construction Skills centre **is Avigilon**	
5.2	**Where is the data stored geographically?**	
	All CCTV footage stored with Camden council authorised personnel who can view CCTV, no access given to CCTV footage to any other member of staff	

5.3	**What roles will have access to the information?** (List individuals or staff groups)
	Only Camden staff who are authorised to review CCTV can access the CCTV system the KXCSC team do not have access to look at this . Any information required from CITB in terms of CCTV footage of a test mist be requested in writing to the Camden CCTV team who have authority to review this
5.4	Is there role-based access control on all applicable systems? **How will access to information be controlled?**
	Only authorised staff can see data who have an individual Hanlon log in with a protected password that only that member of staff knows . CCTV is password protected only authorised Camden council staff can access footage .
5.5	**Is there an ability to audit access to the information?**
	CCTV auditing will only take place by Camden council department associated with CCTV no other team require access
5.6	**What security and audit measures have been implemented to secure access to and limit use of personal data/special categories data and/or criminal data?**
	Only fully registered candidates once entered on the Pearsons exam system are allowed into the exam room where the CCTV footage will take place and can be recorded for the CITB auditor as and when they require it within a 30 day period of taking the actual test. When CCTV footage is required from CITB in terms of a skills audit the KXCSC manager is required to email the CCTV security team to gain footage of a particular time when a test took place that the CITB require to audit , this will be sent in an encrypted file to the CITB at no point will KXCSC staff see the footage only the auditor from CITB
5.7	**Has the Information Security Manager advised on the security measures? What were his/her comments?**
	Cleared

Step 6: Identify and Assess Risks			
Describe source of privacy (data protection, privacy and information security) risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary. **These are the risk *before* any controls (mitigations are applied).** Assess risk assuming there are no controls in place- controls/mitigations are discussed in the next step. **Use tables 1, 2 and 3 in the appendix to help you.** *Note that risks and scores are subject to review and change by IRT/DPO*	**Likelihood of harm- see table 1**	**Severity of harm- see table 2**	**Overall risk – see table 3**
Audio recordings CSCS test candidates could be misused by people gaining access to the audio and visual , misrepresenting what is happening in the test room.	Possible	Moderate	9- medium high
Privacy Intrusion- recording audio as well as video is highly privacy intrusive.	Likely	Moderate	12- medium high
Data retained beyond 30 days	Likely	Moderate	12- medium high
Data shared with inappropriate persons	Likely	Moderate	12- medium high
Insecure controls result in data breach and data being lost	Likely	Moderate	12- medium high

Step 7: Identify Measures to reduce risk

Identify measures to reduce or eliminate risks identified in step 6. *Remember that risks need to be reduced to an acceptable level, and not all risks can be eliminated.*

Then calculate the risk that remains after the mitigations/controls are in place: the residual risk. Tables 1, 2 and 3 will help with this. *Note that risks and scores are subject to review and change by IRT/DPO*

The Information Asset Owner/s need to decide if the mitigations are achievable and if the residual risk is accepted in the 'measure approved?' column by inserting a Yes or No. Table 4 provides guidance on what level of residual risk could be acceptable.

Risk identified in step 6	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
Misuse of audio CCTV	All CCTV footage is only viewed by authorised personnel who can access CCTV	Reduced	Low	yes
Privacy intrusion	Audio recordings are a requirement of the skills provider. Recording only undertaken for the exam when those recorded know they are being receded and the environment is artificial ie they are not behaving naturally . Recording is less intrusive than of day to day actions. However the inherent intrusion cannot be removed.	Reduced	Moderate	yes
Data Retention	CCTV footage is automatically deleted after 30 days	Reduced	Low	yes
Inappropriate sharing	The council has policies and processes in place to guard against this. There are agreements in place between the parties to cover appropriate sharing.	Reduced	Low	yes
Data Breach	CCTV is covered in the CSCS testing room including recording audio. No staff or clients can access the CCTV due to being password protected . only Camden staff with CCTV training can access this system	Reduced	Low	yes

Residual (remaining) risk level when all mitigations have been applied: ***Note IRT/DPO may change this***

Medium

Step 8: Record Data Protection Officer advice and outcome	
DPO involved in preparing DPIA? **If not, name of IRO**	No, Sarah Laws Data Protection Manager, and [redacted] CCTV Manager
DPO advice	Approved, Andrew Maughan DPO May 2022
Information Asset Owner acceptance of residual risks	Mark Booth Employment services manager
This DPIA will kept under review by: (*usually the author or the IAO)*	[redacted]

Version Control

Version	Reason	Date	Author(s)
1.0	New draft	April 2022	[redacted], Sarah Laws
2.0	Cleared final	May 2022	[redacted], Sarah Laws

Appendix - data flow diagram

