

Privacy Impact Assessment (PIA)

Step one: Identify the need for a PIA

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.

You may find it helpful to link other relevant documents related to the project, for example a project proposal.

Also summarise why the need for a PIA was identified (this can draw on your answers to the screening questions). *[For screening questions, see annex one attached]*

The installation of three AutoSpeedWatch cameras is part of a wider East Hampshire initiative, particularly aimed at identifying the highest and most persistent speeding vehicles, and allowing these vehicles to be reported to Hampshire Police. Speed is one of the main factors in road collisions and the main topic on which Rowlands Castle Parish Council is contacted by residents. It is hoped that the parish will benefit from reduced traffic speeds on its roads as a result of greater enforcement of the speed limits by Hampshire Police.

The need for a PIA was identified due to the cameras potentially being perceived as being privacy intrusive.

The cameras are very directed to a specific point in the centre of the carriageway and photograph the rear of speeding vehicles only. No pavements or properties are in shot.

Step one: Describe the information flows

The collection, use and deletion of personal data should be described here and it may also be useful to refer to a flow diagram or another way of explaining data flows. You should also say how many individuals are likely to be affected by the project.

No personal data is collected from the AutoSpeedWatch Project.

Consultation Requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out consultation? You should link this to the relevant stages of your project management process.

Consultation can be used at any stage of the PIA process.

Consultation is not required as no personal data is collected.

Cameras will be monitored daily by the Parish Council's authorised Speedwatch Co-ordinator, and they will ensure that no movement of their positioning has taken place. This would only occur in the event of deliberate tampering/vandalism.

Step three: Identify the privacy and related risks

Identify the key privacy risks and the associated compliance and corporate risks. Larger-scale PIAs might record this information on a more formal risk register.

Privacy Issue	Risk to Individuals	Compliance risk	Associated organisation/ corporate risk
<i>Possible perception of privacy intrusion by neighbouring properties/ pedestrians using the pavements</i>	<i>Perceived privacy intrusion</i>	<i>N/A</i>	<i>N/A</i>

Step four: Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary (e.g. the production of new guidance or future security testing for systems).

Risk	Solution(s)	Result: is the risk eliminated, reduced, or accepted?
<i>Perceived privacy intrusion</i>	<i>Daily monitoring of cameras by Parish Council's authorised Speedwatch Co-ordinator to ensure that no movement has taken place to affect the specific positioning.</i> <i>Monthly maintenance check by Parish Council's Contractor to ensure camera mountings remain firmly fixed.</i>	<i>The perceived risk is eliminated</i>

Step five: Sign off and record the PIA Outcomes

Who has approved the privacy risks involved in the project? What solutions need to be implemented?

Risk	Approved Solution(s)	Approved by
<i>Perceived privacy intrusion</i>	<p><i>Daily monitoring of cameras by Parish Council's authorised Speedwatch Co-ordinator to ensure that no movement has taken place to affect the specific positioning.</i></p> <p><i>Monthly maintenance check by Parish Council's Contractor to ensure camera mountings remain firmly fixed.</i></p>	<i>Clerk to RCPC, Lisa Walker</i>

Step six: Integrate the PIA outcomes back into the project plan

Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns which may arise in the future?

Action to be taken	Date for completion of actions	Responsibility for action
<i>Daily monitoring of cameras to ensure that no movement has taken place to affect the specific positioning.</i>	<i>Ongoing daily and monthly actions</i>	<i>Speedwatch Co-ordinator</i>
<i>Monthly maintenance check to tighten camera mounting fixings</i>		<i>Parish Council Contractor</i>

Contact Point for future Privacy Concerns:

Lisa Walker, Clerk to Rowlands Castle Parish Council

Annex One

Privacy Impact Assessment Screening Questions

These questions are intended to help organisations decide whether a PIA is necessary. Answering 'yes' to any of these questions is an indication that a PIA would be a useful exercise. You can expand on your answers as the project develops if you need to.

You can adapt these questions to develop a screening method which fits more closely with the types of project you are likely to assess.

• Will the project involve the collection of new information about individuals?	No
• Will the project compel individuals to provide information about themselves?	No
• Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?	No
• Are you using information about individuals for a purpose it is not currently used for, or in a way it is not currently used?	No
• Does the project involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition?	Yes
• Will the project result in you making decisions or taking action against individuals in ways which can have a significant impact on them?	No
• Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records, criminal records or other information that people would consider to be particularly private?	No
• Will the project require you to contact individuals in ways which they may find intrusive?	No