



**Tower Bridge
Security Team**
Tower Bridge Road, London
SE1 2UP

**CCTV PRIVACY IMPACT ASSESSMENT
28TH SEPTEMBER 2018**

Review Date	Comment	Author
28 TH September 2018	Creation	G. Nie

Introduction

Tower Bridge has a comprehensive CCTV surveillance system within / on Tower Bridge and The Monument for the principal purpose of preventing and detecting crime. It also is used during bridge lifts to assist with the safety of members of the public to ensure that the relevant areas of the bridge are clear before commencing the lifting operation.

The images from the CCTV system are monitored in the control room located locally, which is staffed by Tower Bridge security personnel 24/7, 365 days a year.

It is recognised that the benefits of operating CCTV for this purpose include reduction of the fear of crime generally and the provision of a safer public environment for the benefit of those who visit, work or access Tower Bridge and Monument.

CCTV Cameras located at the Monument are capable of being monitored by Tower Bridge employees for reasons of safety and security. CCTV images monitored by 'General employees' will show live images only and will not or give access to archived images / recorded images.

Privacy Impact Assessment Level 1

Location of surveillance camera system being assessed: Tower Bridge ,Tower Bridge Road, Tower Bridge, London, SE1 2UP.

Date of Assessment	28/09/2018
Review Date	27/09/2019
Name of Person Responsible	Garry Nie – Security Supervisor

1. What is the Organisations purpose for using the surveillance camera system and what are the issues that the system aims to address?

The Tower Bridge CCTV Surveillance system has been installed and is monitored in line with the following objectives:

- To assist in the prevention and detection of crime;
- To facilitate the identification, apprehension and prosecution of offenders in relation to crime, public order and hostile reconnaissance;
- To aid public safety;
- To assist with the management of car parks and public highways; and
- To assist senior staff with disciplinary procedures in cases of serious misconduct.
- To assist with public safety during bridge lifts.

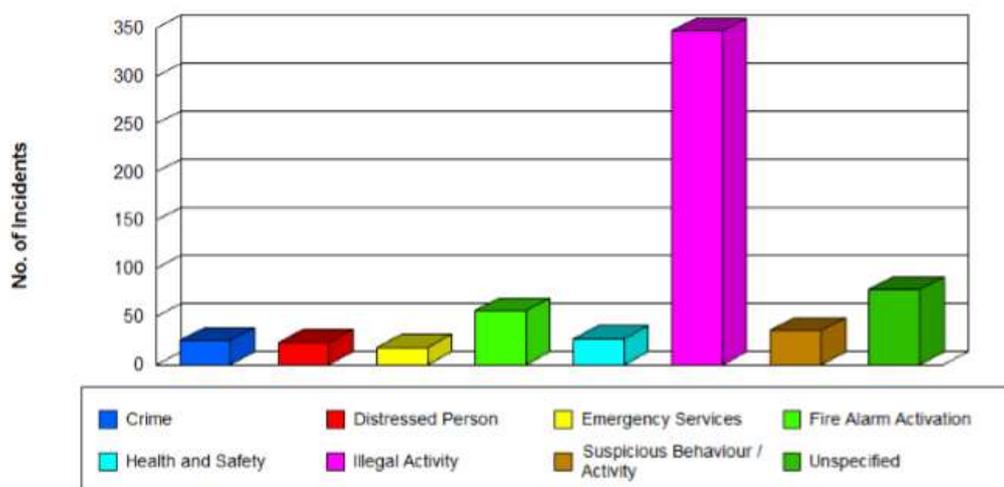
Due to public concern surrounding a surveillance society, the use of CCTV surveillance must be consistent with respect for individuals' privacy and due to this concern other methods of achieving the objectives of CCTV surveillance system will be considered before installation of any CCTV camera on Tower Bridge and / or Monument premises.

Incident statistics where CCTV has been used for the period 25/09/2017 – 25/09/2018 are detailed below:

Recorded incidents:

Incident type	Amount reported
Crime	25
Distressed person	23
Emergency Services	18
Fire Alarm Activation	56
Health and Safety	27
Illegal Activity	347
Suspicious Activity / Behaviour	35
Unspecified	78
Total	609

Incidents by Category



Over 600 incidents occurred with 99.34% of incidents occurred at Tower Bridge.

2. Can a surveillance camera technology realistically deliver these benefits?

To deter crime and disorder	✓
To reduce crime and disorder	✓
To reduce the fear of crime	✓
To provide evidence of crimes for legal purposes	✓
To assist in traffic management	✓
To provide evidence for civil litigation	✓
To assist City of London Corporation to manage public infrastructure and services	✓
Other (Please Explain)	The use of Body Worn Video Cameras (BWVC) also allows

	audio recording that can assist and help protect Security Staff when dealing with incidents, where allegations are made the equipment if used correctly negates those allegations.
--	--

3. What are the views of those who will be under surveillance?

No formal consultation has taken place, but staff, visitors, contractors and members of the public can visibly see the equipment used and carried overtly, with numerous signs around Tower Bridge and the Monument to inform them of the use of CCTV equipment.

Security staff in the use of BWVC announce the use of the equipment at incidents which allows everyone to know the equipment is being used. The CCTV and Data Protection policy for Tower Bridge outlines the complaints procedure, with the management of the system being identified within external signage.

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

Measures have been taken to remove the threat of breaches of privacy with the use of privacy settings and restricting cameras positions to prevent privacy-intrusion. We have concluded that lighting is sufficient to ensure CCTV is effective for its purpose.

5. What are the benefits to be gained from using surveillance cameras?

To deter crime and disorder	✓
To reduce crime and disorder	✓
To reduce the fear of crime	✓
To provide evidence of crimes for legal purposes	✓
To assist in traffic management	✓
To provide evidence for civil litigation	✓
To assist City of London Corporation to manage public infrastructure and services	✓

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

Every consideration has been made looking at alternatives to the use of CCTV and BWVC. No camera has been installed directly in line with a window where privacy would be expected.

Digital privacy settings have been installed on all cameras to ensure an individual's privacy.

All operators are SIA licenced trained and have received further training in-house and externally in CCTV legislation, data protection and GDPR.

Adequate signage is in place throughout the site and system.

All monitors used by operators are recorded and images are only kept for as long as necessary and governed by legislation unless archived.

The use of BWVC will occur only during incidents and the only footage that is downloaded and stored for evidence is chosen by the recording officer or manager of the system and managed by security supervisor level and above. The camera once downloaded is then wiped clean of any data and any downloads are archived in-line with current legislation. The CCTV Policy Statement outlines this procedure and after this time the download if not used in circumstances outlined above it is deleted.

The use of BWVC is only ever intended to capture the persons who are involved in the incident but if others are present then obviously the camera will capture them. If the recordings are used in evidence, we then mask un-involved individuals, so these innocent parties are not identifiable.

The handling of all CCTV evidence is strictly managed within the Control Room and the evidence downloaded and archived can only be viewed by authorised staff members and can only be produced as evidence with a request from at least a member of staff with the grade of Security Supervisor.

7. Have any privacy by design features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements?

During the installation of the new Tower Bridge Security Control Room in 2016 CCTV safeguards were put in place to reduce privacy intrusion. A key introduction was to ensure only authorised person(s) have access to the Security Control Room and all authorised staff have agreed and signed a declaration of confidentiality.

Areas that we have identified as being intrusive of an individuals privacy for example, residential dwellings have been pixelated. With exception of BWVC all CCTV cameras record visually only and have no way of recording sound.

Privacy Zones	✓
Operator Training	✓
Operational Audit	✓

8. What Organisations will be using the CCTV images and where is data controller responsibility under the Data Protection Act 1998 / GDPR?

City of London Corporation	Comptroller and City Solicitor – 0207 940 1091 CCSDEPT@corpoflondon.onmicrosoft.com
City of London Police	Information sharing protocols are in place for these organisations. Data Controller head of Department
Metropolitan Police	

All release of CCTV evidence requires the relevant disclosure document to be completed before the authorisation for the release of footage is provided.

Third Party requests for CCTV are dealt with via the Comptroller and City Solicitor for the City of London Corporation.

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

The identification of persons involved in the use of CCTV and BWVC is paramount and the primary use as outlined as the images obtained from the system may be used in both criminal and civil proceedings. In addition, the audio use of BWVC provides primary evidence where individuals admit to offences prior to the arrival of Police.

10. Will the surveillance camera equipment being installed, and the system of work being adopted be sustainable?

Yes, the Tower Bridge and Monument CCTV is sustainable and is an essential asset used in achieving the outlined objectives. Maintenance agreements are in place with annual budgets for improvements and operational requirements.

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

The CCTV system will continue to deliver the desired benefit and the use of the system will be monitored as part of the outlined requirements. The current system is reviewed on a yearly basis as part of the Tower Bridge maintenance programme along with the CCTV upgrade requirements.

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

Apart from the ongoing CCTV upgrade works there is no planned use of images due to demands.

Human Rights Act 1998

Section 6(1) of the Human Rights Act 1998 (HRA) provides that it is unlawful for a public authority to act in a way which is contrary to the rights guaranteed by the European Convention on Human Rights. Therefore, in addition to the above, if you are a public authority, you must make sure your system complies with the requirements under the HRA.

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

Tower Bridge Security operates the Public Space Surveillance CCTV system on behalf of the City of London Corporation in accordance with the law and

acknowledges that released footage may be released to investigatory agencies in respect of breaches to the outlined objectives.

Data Protection Act 1998
Article 8 and 14 Human Rights Act
Freedom of Information Act 2000
General Data Protection Act 2018

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

The system is used to ensure that the area of Tower Bridge and the Monument is safe and secure. CCTV is an essential tool used by Tower Bridge Security to maintain the safety and security of people who work, visit or cross Tower Bridge.

The Bridge is positioned between the London Borough of Southwark and The London Borough of Tower Hamlets where crime and anti-social behaviour is prevalent. When incidents occur on Tower Bridge the use of the CCTV and BWVC is used to detect and prevent crime. When incidents occur the use of BWVC and CCTV can support and negate complaints and therefore assist primary evidence for all parties, to assist in determining the outcome.

3. Is it justified in the circumstances?

The evidence that is recorded on the CCTV and BWVC is primary and justified to support security staff to undertake their duties. Security staff do not have Personal Protective Equipment that Police Officers have, but due to Tower Bridge being a public highway / right of way, it is the role of Security staff to interact with challenging individuals who will not co-operate in many circumstances. The use of BWVC would therefore be a good form of personal protective equipment and is therefore, extremely justified.

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

The use of CCTV on and within Tower Bridge and the Monument is proportionate as it will be used to keep people safe who are working, crossing and visiting. The installation and its use comply with current guidance and legislation.

The privacy issues are always at the forefront of staff who are deployed to use BWVC. The use of the cameras is proportionate and only used at incidents where primary evidence can be obtained, or the officer feels that the need to record what is happening at the incident for their own protection is paramount.

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

The use of CCTV on Tower Bridge and Monument is carried out in accordance with current legislation and complies with Guidance around Article 8 of the European Convention on Human Rights to ensure the gathering of data is proportionate, legal,

accountable, necessary and likely to cause minimal invasion to privacy and does not discriminate any particular group or individual.

The use of BWVC does not discriminate at all. The recordings are there for anyone to view in the correct circumstances.

Privacy Impact Assessment Level 2

Principle 2 – The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.

Step 1: Camera Specification

System operators / owners should include below all camera types and system capabilities and their likely application and expected use.

ID	Camera Types	Makes and Models	Amount	Description	Justification and Expectation
1	Standard Static	Axis	07	Static Images, no movement or zoom function (fixed lens)	Public Space Monitoring from CCTV Control Room 24/7
2	HD Static	Axis	60	Static Images, no movement or zoom function (fixed lens)	Public Space Monitoring from CCTV Control Room 24/7
3	HD PTZ	Axis	14	Pan, Tilt and Zoom Function	Public Space Monitoring from CCTV Control Room 24/7
4	Standard PTZ	Axis	2	Pan, Tilt and Zoom Function	Public Space Monitoring from CCTV Control Room 24/7
5	Covert	N/A	N/A	N/A	N/A
6	ANPR	N/A	N/A	N/A	N/A
7	BWVC	Edesix	1	Body Worn Video Camera with 130 degree horizontal field of view, day and night recording capability, RFID touch-assign	Public and Staff Safety and Security

				enabled and integrated pre-record function with Wi-Fi capability.	
--	--	--	--	---	--

Step 2: Location

Each system operator / owner should list and categories the different areas covered by surveillance on their system. This list should use the specifications above which ID (types) are used at each specific location.

Cat	Location type	Camera Types used	Amount	Recording	Monitoring	Assessment of Equipment (Mitigations and Justifications)
A	External Tower Bridge	3,2,1	33	24Hours	24 Hours	The use and monitoring of CCTV cameras is to ensure the safety of staff, visitors and members of the public who access Tower Bridge or the Monument. The areas have appropriate signage identifying its purpose and system contact owners.
B	Internal Tower Bridge	2	42	24 Hours	24 Hours	
C	Internal Monument	1	6	24 Hours	24 Hours	
D	External Monument	4	2	24 Hours	24 Hours	
E	All Areas	7	1	During Incidents	Live stream to VMS	To be worn by officers overtly whilst on patrol and to record incidents where primary evidence is required to assist with criminal and civil prosecution or disciplinary matters.

Step 3: Asset Register

It is considered to be good practice for all organisations to maintain an asset register for all of their devices. This allows the system owner to record each site and equipment installed therein categorised in a manner to lead to the level two process.

Tower Bridge				
Camera Number	Reviewed / Updated	Camera Type	Location Category	Further Mitigation / Comments
01	09/03/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
02	23/02/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
03	09/03/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
04	09/11/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
05	09/11/2016	2	B	
06	09/03/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
07	09/11/2016	2	B	
08	09/11/2016	2	B	
09	09/11/2016	2	B	
10	09/03/2016	2	B	
11	14/10/2016	2	B	
12	14/10/2016	2	B	
13	25/01/2017	2	B	
14	25/01/2017	2	B	
15		1	B	
16		4	A	Digital Privacy Zone used to obscure residential and commercial property
17	09/11/2016	2	A	
18	09/11/2016	2	A	
19	23/02/2017	3	A	Digital Privacy Zone used to obscure residential and commercial property
20	23/02/2017	3	A	Digital Privacy Zone used to obscure residential and commercial property
21				
22		2	B	
23		1	B	
24	16/01/2017	2	B	
25	09/11/2016	2	B	

26	09/11/2016	2	B	
27	09/11/2016	2	B	
28		1	B	
29		1	B	
30		1	B	
31		1	B	
32	09/11/2016	2	B	
33	09/11/2016	2	B	
34	09/11/2016	2	B	
35	09/11/2016	2	B	
36	09/03/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
37		1	B	
38		1	B	
39	09/11/2016	2	B	
40		1	A	
41	28/04/2017	2	A	
42	28/04/2017	2	A	
43	28/04/2017	2	A	
44	28/04/2017	2	A	
45	09/03/2016	2	A	
46	09/03/2016	2	B	
47	09/03/2016	2	B	
48	09/03/2016	2	A	
49	09/03/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
50	09/03/2016	3	A	Digital Privacy Zone used to obscure residential and commercial property
51	28/04/2017	2	A	
52		1	B	
53		1	B	
54		1	B	
55		1	B	
56	28/04/2017	2	A	
57	28/04/2017	3	A	Digital Privacy Zone used to obscure residential and commercial property
58	28/04/2017	3	A	Digital Privacy Zone used to obscure residential and commercial property
59	09/11/2016	2	B	
60	09/11/2016	2	B	
61	09/11/2016	2	B	
62				
63		1	B	
64	09/11/2016	2	B	

65				
66				
67				
68				
69				
70				
71				
72				
73	23/11/2015	2	B	
74	23/11/2015	2	B	
75	23/11/2015	2	B	
76	23/11/2015	2	B	
77				
78	23/11/2015	2	B	
79	23/11/2015	2	B	
80	23/11/2015	2	B	
81				
82				
83	09/03/2016	2	A	
84				
85				
86	09/11/2016	2	B	
87	23/11/2016	1	B	
88	23/11/2016	2	B	
89	23/11/2016	2	B	
90	23/11/2016	2	B	
91	23/11/2016	2	B	
92	23/11/2016	2	B	

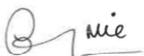
The Monument				
Camera Number	Reviewed / Updated	Camera Type	Location Category	Further Mitigation / Comments
1		4	A	
2		4	A	
3		1	B	
4		1	B	
5		1	B	
6		1	B	
7	01/09/2017	2	B	Privacy settings applied to rest area

Step 4: Mitigation for specific cameras that have a high privacy risk

For occasions where there is a very high impact an Authority may wish to conduct an extensive PIA of Specific Installations and the site and have it fully documented.

Camera Number	Camera 7 at the Monument
Camera Location	The Monument, Pavilion Staff Welfare Facilities

Privacy Risk(s)	Solution	Outcome (is the risk removed, reduced or accepted)	Justification (is the impact after implementing each solution justified compliant and proportionate to the aim of the camera?)
Breach of personal privacy as the area it covers is a welfare area and the camera has solely been installed to monitor the activities around the safe.	Privacy settings added to black out all areas other than the safe. Access by authorised officers only.	Risk removed – can only see what the CCTV was installed to cover	Justified, compliant and proportionate to meet the requirements.

Agreed With	Garry Nie
Signature	
Date	28/09/2018
Review Date	27/09/2019