

Data Privacy Impact Assessment Template

The issue of privacy and confidentiality arises when an organisation carries out any task that involves processing or sharing personal data/information or commercially sensitive data/information. To enable the Trust to address any privacy concerns, a data privacy impact assessment (DPIA) should be used to assess privacy risks to individuals in the collection, use, storage, disclosure and disposal of data/information. The DPIA can assist in the identification of privacy risks, foresee problems and bring forward solutions.

As per the introduction of the General Data Protection Regulation, Data Protection Impact Assessments (DPIA) are now mandatory for organisations where certain listed types of processing or any other processing that is likely to result in a high risk to individuals' interests.

A PIA should be carried out for the following tasks (this list is not exhaustive):

- A data sharing initiative where two or more organisations seek to pool or link sets of personal data
- Proposals to identify patients in a particular group or demographic
- New projects
- Any changes to existing projects/procedures/systems
- Using existing data for a new, unexpected or more intrusive purpose
- Information Sharing Protocols
- Relocation of staff or equipment
- Stakeholder Engagement e.g. surveys

Please complete this document and submit this to the Data Protection Officer for approval.

Privacy Impact Assessment Template

Background Information			
Project/Activity/ Asset Name:	CCTV	Date of PIA submission:	6 th September 2019 Reviewed 30/10/2025
Project/Activity/ Asset Leads Name:	XXXX	Project/Activity/ Asset Leads Contact Details:	0121 301 1030
Sponsor (e.g. Project Board) or Lead:	V Devlin Director of Ops.	Lead Organisation:	BSMHFT
Name of individual submitting this PIA/Key contact: XXXX			

Step 1: Identify the need

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents such as a project proposal. Summarise why you identified the need for a DPIA.

Trust CCTV systems are installed to enhance the physical security of Trust premises. The primary function is to act as a visual deterrent to those minded to commit criminal activities against Trust property and assets.

The purpose of the CCTV scheme is:

Crime Prevention & detection

Identification, apprehension and prosecution of offenders

Safety and security of service users, staff, visitors, property and assets

Trust investigation processes.

CCTV is also installed within Trust seclusion suites. These systems are standalone, accessible only to on duty staff within the seclusion suite and do not record/capture any data. Their sole function is for the safety and security of service users & staff if observation windows/door hatches are deliberately obscured by a service user within the suite.

Step 2: Describe the processing

How will you collect, use store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or another way of describing data flows. What types of processing identified as likely high risk are involved?

How will you collect, use store and delete data? The CCTV cameras will provide passive monitoring of Trust sites and building. CCTV will record footage of all public areas, perimeters, car parks and pedestrian routes within defined areas of Trust sites. Data is stored on servers securely located within Trust locations. Data will be retained for a period of 30 days, unless relating to a specific incident/investigation, after which it is automatically deleted from the server.

What is the source of the data? CCTV footage from fixed position clearly visible cameras.

Will you be sharing data with anyone? Criminal Justice agencies, such as police and Crown Prosecution Service. Trust Management undertaking formal investigations and subject to appropriate and approved SAR's, Insurance companies and Solicitors.

What types of processing identified as likely high risk are involved?

None

Step 3: Describe the scope of processing

What is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

What is the nature of the data, and does it include special category or criminal offence data? The data relates to the capture of images only. These images can be used by Police to identify alleged offenders and support criminal prosecutions.

How much data will you be collecting and using? The CCTV images are collected in a passive/remote process.

How often? Daily on a 24/7 basis.

How long will you keep it? 30 days, unless relating to a specific incident/investigation, after which it is automatically deleted.

How many individuals are affected? All users of Trust sites where CCTV equipment has been installed. This includes service users, visitors, staff and third party contractors.

What geographical area does it cover?

Birmingham and Solihull areas are covered, but CCTV isn't fitted in all sites. Where fitted, all publicly accessible area, such as car parks, pedestrian routes, reception and waiting areas are covered.

Step 4: Describe the context of the processing

What is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme?

What is the nature of your relationship with the individuals?

The relationship is that of healthcare provider to its service users/ patient's family and employer to its staff and contractors.

How much control will they have?

All sites where CCTV is fitted have appropriate warning/information signage installed in relation to the use of CCTV.

Would they expect you to use their data in this way?

Yes

Do they include children or other vulnerable groups?

Yes

Are there prior concerns over this type of processing or security flaws?

No. CCTV is a well established security method.

Is it novel in any way?

No

What is the current state of technology in this area?

It is a well established technology.

Are there any current issues of public concern that you should factor in?

No

Are you signed up to any approved code of conduct or certification scheme?

Data Protection Act 2018, General Data Protection Regulation

Step 5: Describe the purposes of the processing

What do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing for you, and more broadly?

What do you want to achieve?

A safe and secure environment for all users of Trust buildings and sites.

What is the intended effect on individuals?

Ensure their safety and protection of their property.

What are the benefits of the processing for you, and more broadly?

CCTV provides a visual deterrent and where incidents occur in areas that are monitored by CCTV, this provides investigating agencies evidence of criminal activities as well as a means of identification of those responsible.

Step 6: Consultation Process

Consider how to consult with relevant stakeholders: Describe when and how you will seek individuals views – or justify why it's not appropriate to do so. Do you need to seek views from the IT security team or any other experts?

CCTV is a recognised means of providing passive method of security to Trust premises. Many of the systems installed have been in place for many years, with subsequent enhancements, upgrades and additions completed as part of the Trusts' Capital Development Programme, which incorporates a fully transparent and inclusive engagement with all relevant stakeholders who are able to raise any views or concerns during the many project meetings.

Step 7: Necessity and Proportionality

Describe compliance and proportionality measures, in particular: What is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and minimisation? What information will you give individuals? How will you support their rights? How do you safeguard against any international transfers?

What is your lawful basis for processing?

6e, 9h.

Does the processing actually achieve your purpose?

Yes

Is there another way to achieve the same outcome?

No

How will you prevent function creep?

Ensure that the CCTV system is maintained and only authorised/trained staff have access.

How will you ensure data quality and minimisation?

Only authorised/trained staff can access the data

What information will you give individuals?

None. Only data relating to a specific incident as requested by official bodies will be shared.

How will you support their rights?

Access to data is restricted to authorised individuals to protect and support individual's rights.

How do you safeguard against any international transfers?

Data is only stored and transferred within the UK only.

Step 8: Identifying measures of risk

Describe the source of risk and nature of potential impact on individuals and the mitigation for the risk. Where will the risk be captured and monitored?

Data transferred out of BSMHFT is done so by hand and encrypted media is used alongside a form that the requester has to sign that highlights their data responsibilities. This is used to mitigate against unauthorised use or disclosure.

CCTV recording equipment (hard drives) are securely stored within locked server rooms and/or secure cabinets.

Access to CCTV footage/recorded media requires a system password.

Monitors are positioned to limit/restrict view to BSMHFT staff/contractors.

Risk Score: 2

RISK SCORING

The prioritisation and allocation of risk

To ensure that meaningful decisions on the prioritisation and treatment of risks can be made, the Trust will grade all risks using the same tool.

- **The 5 x 5 Risk Scoring Matrix (AS/NZS 4360:1999) will be used to assign risk priority.**

It is essential to have one system for prioritising and rating risks, and this will be used to prioritise risks on the Assurance Framework and Risk Registers, and for rating incidents, complaints, and claims. Risk analysis uses descriptive scales to describe the magnitude of potential consequences and the likelihood that those consequences occur.

Measures of likelihood – likelihood scores (non financial risks):

Likelihood score	1	2	3	4	5
Descriptor	Rare	Unlikely	Possible	Likely	Almost Certain
Frequency	Not expected to occur for years	Expected to occur at least annually	Expected to occur at least monthly	Expected to occur at least weekly	Expected to occur at least daily

Measures of Likelihood – likelihood scores (financial risks):

Likelihood score	1	2	3	4	5
Descriptor	Rare	Unlikely	Possible	Likely	Almost Certain
Frequency	Not expected to occur in the current or next year	Unlikely to occur during the current or next year	Could easily occur during the current or next year	Will probably occur during the current or next year	Definitely will occur during the current or next year

Note:

Measures of likelihood have to be applied to actual consequence detailed in the risk, it is expected that there is some evidence of these.

For instance a risk defined in relation to a service user falling leading to a fracture should not be based on the likelihood of a service user falling, but of falling AND this leading to a fracture.

Measures of Consequence – Domains, consequence and examples of score descriptors

	Consequence Score (severity levels) and examples of descriptors				
	1	2	3	4	5
Domains	Negligible	Minor	Moderate	Major	Catastrophic
Impact on the safety of patients, staff or public (physical / psychological harm)	Minimal injury requiring no or minimal intervention or treatment No time off work required	Minor injury or illness requiring minor intervention Requiring time off work <3days Increase in length of hospital stay by 1-2days	Moderate injury requiring professional intervention Requiring time off work 4-14 days RIDDOR/agency reportable incident An event that impacts on a small number of patients	Major injury leading to long-term incapacity / disability Requiring time off work >14days Increase in length of hospital stay by >15days Mismanagement of patient care with long term effects	Incident leading to death Multiple permanent injuries or irreversible health effects An event which impacts on a large number of patients
Quality Complaints Audit	Peripheral elements of treatment or service sub-optimal Informal complaint or inquiry	Overall treatment or service sub-optimal Formal complaint (stage 1) Local resolution Single failure to meet internal standards Minor implications for patient safety if unresolved Reduced performance rating if unresolved	Treatment or service has significantly reduced effectiveness Formal complaint (stage 2) Local resolution (with potential to go to independent review) Repeated failure to meet internal standards Major patient safety implications if findings are not acted on	Non-compliance with national standards with significant risk to patients if not resolved Multiple complaints / independent review Low performance rating Critical report	Incident leading to totally unacceptable level or quality of treatment or service Gross failure of patient safety if findings not acted on Inquest / Ombudsman inquiry Gross failure to meet national standards
Human Resources / Organisational Development / Staffing	Short-term low staffing level that temporarily reduces service	Low staffing level that reduces service quality	Late delivery of key objective / service due to lack of staff	Uncertain delivery of key objectives / service due to	Non-delivery of key objectives due to lack of staff

Competence	quality (<1 day)		Unsafe staffing level or competence (>1day) Low staff morale Poor staff attendance for mandatory / key training	lack of staff Unsafe staffing levels or competence	On-going unsafe staffing levels or competence Loss of several key staff No staff attending mandatory training / key training on an ongoing basis
Statutory duty / Inspections	No or minimal impact or breach of guidance / statutory duty	Breach of statutory legislation Reduced performance rating if unresolved	Single breach in statutory duty Challenging external recommendations / improvement notice	Enforcement action Multiple breaches in statutory duty Improvement notices Low performance rating Critical report	Multiple breaches in statutory duty Prosecution Complete systems change required Zero performance rating Severely critical report
Adverse publicity / Reputation	Rumours Potential for public concern	Local media coverage – short term reduction in public confidence Elements of public expectation not being met	Local media coverage – long-term reduction in public confidence	National media coverage with <3 days service well below reasonable public expectation	National media coverage with >3days service well below reasonable public expectation. MP concerned (questions in the House) Total loss of public confidence
Business objectives / projects	Insignificant cost increase / schedule slippage	<5% over project budget Schedule slippage	<5-10% over project budget Schedule slippage	Non-compliance with national 10-25% over budget project Schedule slippage Key objectives not met	Incident leading >25% over project budget Schedule slippage Key objectives not met
Finance – including claims	Non delivery/Loss of budget to value of <£10K	Non delivery/Loss of budget between £10K and £100K	Non-delivery/Loss of budget between £100K and £500K	Non delivery/Loss of budget between £500K and £2M	Non-delivery/Loss of Budget of more than £2M
Service Business interruption / Environmental impact	Loss of interruption / >1hour Minimal or no impact on environment	Loss of interruption / >8hours Minot impact on environment	Loss / interruption of >1day Moderate impact on environment	Loss of interruption / >1week Major impact on environment	Permanent loss of service or facility Catastrophic impact on environment

Measures of Consequence – Additional guidance and examples relating to risks impacting on the safety of patients, staff or public

	Consequence Score (severity levels) and examples of descriptors				
	1	2	3	4	5
Domains	Negligible	Minor	Moderate	Major	Catastrophic
Additional examples	<p>Incorrect medication dispensed but not taken</p> <p>Incident resulting in a bruise or graze</p> <p>Delay in routine transport for patient</p>	<p>Wrong drug or dosage administered, with no adverse side effects</p> <p>Physical attack such as pushing, shoving or pinching causing minor injury</p> <p>Self-harm resulting in minor injuries</p> <p>Grade 1 pressure ulcer</p> <p>Laceration, sprain, anxiety requiring occupational health counselling – no time off work required</p>	<p>Wrong drug or dosage administered with potential adverse side effects</p> <p>Physical attack causing moderate injury</p> <p>Self-harm requiring medical attention</p> <p>Grade 2-3 pressure ulcer</p> <p>Healthcare-acquired infection (HCAI)</p> <p>Incorrect or inadequate information / communication on transfer of care</p> <p>Vehicle carrying patient involved in road traffic accident</p> <p>Slip / fall resulting in injury such as sprain</p>	<p>Wrong drug or dosage administered with adverse side effects</p> <p>Physical attack causing serious injury</p> <p>Grade 4 pressure ulcer</p> <p>Long-term HCAI</p> <p>Slip / fall resulting in injury such as dislocation, fracture, blow to the head</p> <p>Loss of limb</p> <p>Post-traumatic stress disorder</p>	<p>Unexpected death</p> <p>Suicide of a patient known to the services within last 12 months</p> <p>Homicide committed by a mental health patient</p> <p>Large-scale cervical screening errors</p> <p>Incident leading to paralysis</p> <p>Incident leading to long-term mental health problem</p> <p>Rape / serious sexual assault</p>

5 x 5 Risk Scoring Matrix (AS/NZS 4360:1999)

L I K E	Almost Certain	5 Yellow	10 Yellow	15 Red	20 Red	25 Red
	Likely	4 Yellow	8 Amber	12 Amber	16 Red	20 Red

L I H O O D	Possible	3 Green	6 Yellow	9 Amber	12 Amber	15 Red
	Unlikely	2 Green	4 Yellow	6 Yellow	8 Amber	10 Amber
	Rare	1 Green	2 Green	3 Green	4 Yellow	5 Yellow
		Insignificant	Minor	Moderate	Major	Catastrophic
		CONSEQUENCE				

Step 8: Sign off		
Item	Name/Date	Notes
Measures approved by:	Stephen Laws 6 th 30/10/2025	Integrate actions back into project plan, with date and responsibility for completion
Risk Score:		
DPO advice provided:		DPO should advise on compliance measures and whether processing can proceed
Summary of the DPO advice:		

Appendix One

Personal data shall be processed fairly and lawfully and, in particular, shall not be processed unless –

(a) at least **one** of the conditions in Article 6 is met, and

(b) in the case of special category personal data, at least **one** of the conditions in Article 9 is also met.

Please tick the appropriate box(es) that apply against Articles 6 and 9 below.

Article 6 – Personal Data	√	Article 9 – Special Category Data	√
The processing is necessary.		a) The data subject has given explicit consent to the processing of those personal data for one or more specified purposes	
a) The data subject has given consent to the processing of his or her personal data for one or more specific purpose		b) Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or data subject in the field of employment and social security and social protection law in so far as it is authorized by Union or Member State law or a collective agreement pursuant to Member Law providing for appropriate safeguards for the fundamental rights and the interests of the data subject	
b) Processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract		c) Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent	
c) Processing is necessary for compliance with a legal obligation to which the controller is subject		d) Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects	

d) Processing is necessary in order to protect the vital interests of the data subject or of another natural person		e) Processing relates to personal data which are manifestly made public by the data subject	
e) Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller		f) Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity	
f) Processing is necessary for the purpose of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child (this does not apply to processing carried out by public authorities in the performance of their tasks)		g) Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	
		h) Processing is necessary for the purposes of preventative or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of the Union or Member State law or pursuant to contact with a health professional	
		i) Processing is necessary for reasons	

		of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy	
		j) Processing is necessary for archiving purpose in the public interest, scientific or historical research purposes or statistical purposes in accordance Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject	