



# Cornwall Council ASB Team Body Worn Video

## Business and Privacy Impact Assessment

Directorate: Communities

Service: ASB Team – Community Safety

BPIA Ref: 306

Version	Date	Details
0.1	03/04/2023	Sections A and B completed by requestor
0.2	03/05/2023	Reviewed by IG team
1.0	16/06/2023	Approved version

<b>Date of assessment:</b>	3rd May 2023
<b>Information Asset Register entry</b> <i>All information assets must be added; include link to entry</i>	[Ref. number & link]

Contacts	Service Lead	IG Team Lead	Information Asset Owner	Information Asset Delegate
<b>Name</b>	Steve Rowell	Gemma Stephenson	Simon Mould	Steve Rowell
<b>Job title</b>	Preventing Extremism & Terrorism Lead and ASB Team Manager	Information Governance Lead	Head of Communities	Preventing Extremism & Terrorism Lead and ASB Team Manager

Information Asset Owner sign-off	
<b>In principle approval of the proposed processing within this BPIA</b> <i>(note that the requester will need to obtain further sign-off from the IAO for any residual risks)</i>	<b>Name: Simon Mould</b> <b>Date: May 2023</b>
<b>IAO sign off for any residual risks identified within the BPIA that require mitigations</b>	<b>Name:</b> <b>Date:</b>

Outstanding actions required	Completion date	Corporate and Information Governance team sign off

**Record of Corporate and Information Governance Team Approval [Office Use Only]**

Type:	Yes	No	N/A	Reasons for declining; any outstanding actions.
Data processing i.e. system procurement, project management, programme work	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	
Power BI data processing	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

<b>Section A (1)</b>					
<b>Project background and governance</b>					
<b>1</b>	<b>Who is the Data Controller?</b> <i>The Data Controller is the organisation which determines the purposes for which and the manner in which personal data are processed.</i>				
	Cornwall Council (ASB Team, Communities & Public Protection)				
<b>2</b>	<b>Is it a joint data controller relationship?</b> <i>i.e. Care providers are considered joint data controllers rather than data processors.</i>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>	<i>Please consult the <a href="#">IG team</a> if you're unsure.</i>	
<b>3</b>	<b>Is there a written arrangement in place regarding each joint controller's responsibilities?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>N/A</b> <input checked="" type="checkbox"/>	<b>Notes</b> <i>If yes, please provide a copy; if no, what steps are you taking to rectify this?</i>
<b>4</b>	<b>Does the project involve any 3<sup>rd</sup> party suppliers?</b> (excluding Microsoft)	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>	<b>Notes</b> <i>If Yes, who are they and what is their role?</i>	
<b>5</b>	<b>If yes, is there a written contract in place containing information governance clauses?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>N/A</b> <input checked="" type="checkbox"/>	<b>Notes</b> <i>If yes, please provide a copy; if no, what steps are you taking to rectify this?</i>
<b>6</b>	<b>What is the scope and purpose of the project?</b> <i>Provide a brief description of what is being planned</i>				
	Implementation of the ASB Body Worn Video (BWV) Policy and procedures and approved body worn video capture devices:				

BWV is an expanding technology being utilised by Cornwall Council. The public's concerns with regard to privacy issues are recognised. Accordingly, this technology will only be deployed in an overt manner, using trained uniformed staff and in defined operational circumstances. All captured data will be processed to ensure compliance with the Data Protection Act and Human Rights Act 1998, Information Commissioners Code of Practice and Surveillance Camera Commissioners guidance.

Common law provides Cornwall Council ASB Team with the authority to use BWV in the lawful execution of its duties; for the purpose of the prevention and detection of crime, and the apprehension or prosecution of offenders. Cornwall Council ASB Team staff are "citizens in uniform", although they are granted additional statutory powers in order to execute their duties, much like the police. ASB Team staff generally do not require special statutory powers to undertake any activity that the public could lawfully undertake. The taking of photographs - and, in its wider sense, video or sound recordings - is deemed lawful and common law (precedent) does not prevent this activity in a public place. (Lord Collins in *Wood v Commissioner of Police for the Metropolis*, 2009).

'Public place' includes any highway, and any other premises or place to which - at the material time - the public have or are permitted to have access, whether upon payment or otherwise. (**Criminal Justice Act 1972, Section 33**).

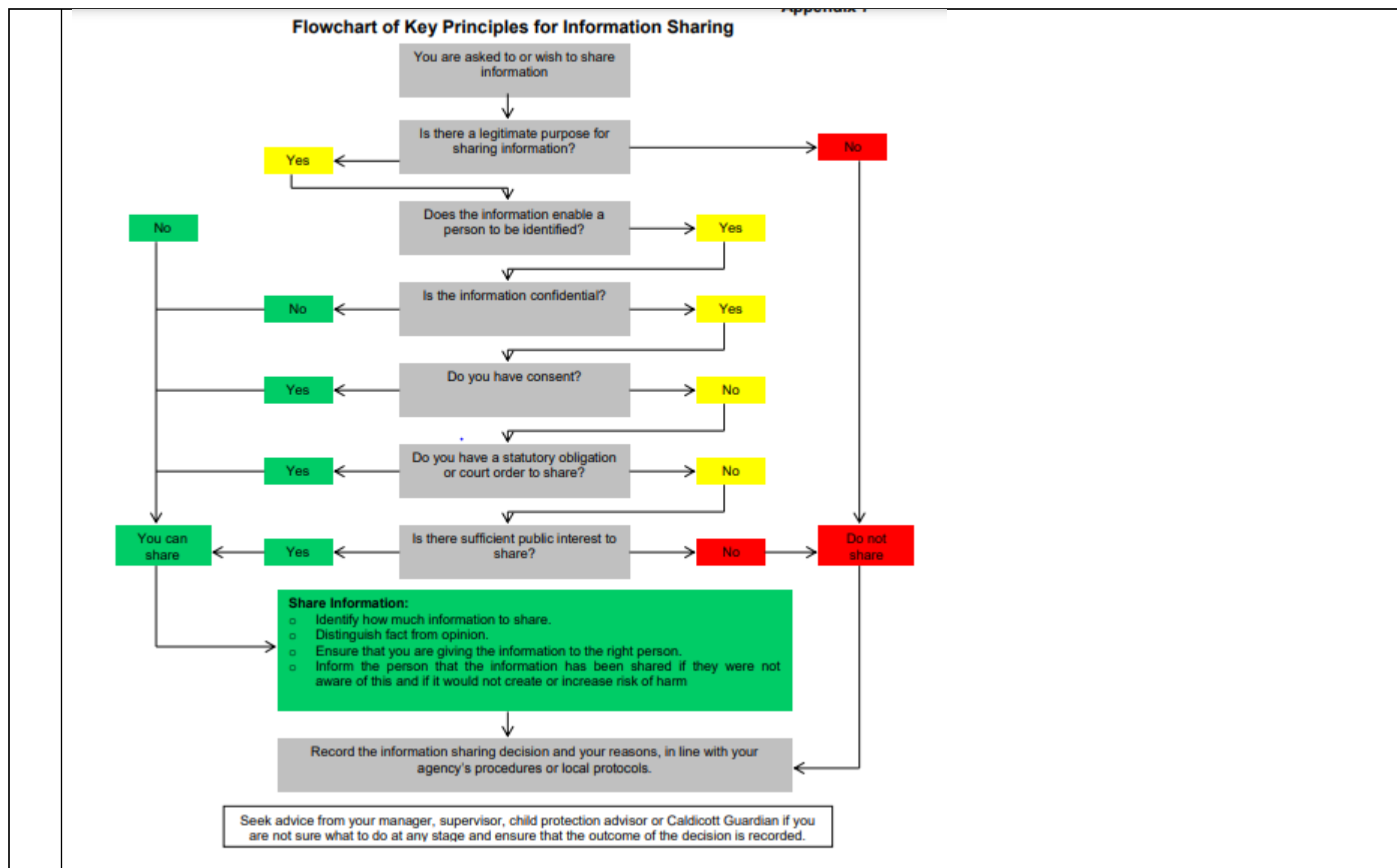
BWV is an overt method by which the ASB Team staff can obtain and secure evidence at the scene of incidents and crimes. These procedures are intended to enable ASB Team staff to comply with legislation and guidance to create evidence suitable for use in court proceedings.

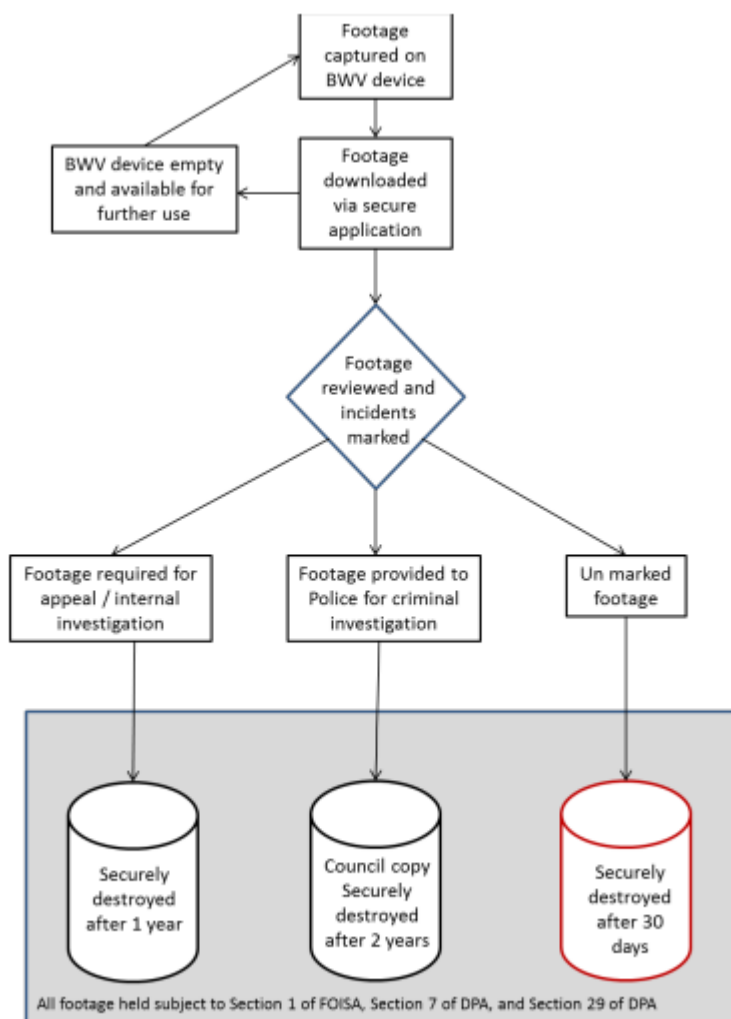
Devices will be operated and will record images and audio in accordance with the conditions as set out in the Policy Procedures. In short ASB Officers will activate the BWV system when the need is identified for evidential reasons, personal safety or serious disorder. Devices will not be operated on continuous record mode. (Incident specific, Proportionate, Legitimate, Necessary, and Justifiable.)

BWV will be used to support:

- de-escalation of conflict or confrontation.
- the prevention or detection of crime and disorder in Cornwall;
- criminal and civil action in the courts (including the use of images as evidence in proceedings);
- the appropriate enforcement authority such as the police by providing for example, BWV footage of street/road incidents;
- the protection of staff;
- dispute resolution eg: complaints against staff;
- the emergency services (the Council has a duty to support emergency services in the undertaking of their duties);

	<ul style="list-style-type: none"> <li>partners, in the prevention of counter terrorism (the Prevent Duty);</li> <li>the development of staff skills through use of operational footage for training purposes.</li> </ul> <p>Incident specific</p>			
<b>7</b>	<b>Is the information shared internally?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, list the relevant data sharing agreements and provide a copy</i>
	<p>Cornwall Council ASB Team work collaboratively with other law enforcement agencies and internal services for the prevention and detection of crime. Existing ISA's facilitate the sharing of appropriate information as defined within the following ISA's to which Cornwall Council and partner agencies are signatories. (See <a href="#">Crime &amp; Disorder ISA</a>)</p>			
<b>8</b>	<b>Is the information shared externally?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, list the relevant data sharing agreements and provide a copy</i>
	<p>Cornwall Council ASB Team work collaboratively with other law enforcement agencies and internal services for the prevention and detection of crime. Existing ISAs facilitate the sharing of appropriate information as defined within the following ISAs to which Cornwall Council and partner agencies are signatories. (See <a href="#">Crime &amp; Disorder ISA</a>)</p> <p>Users and investigators must remember that, where cases are prosecuted, BWV footage is 'material gathered' during an investigation and therefore may be subject to disclosure responsibilities. BWV footage in these cases should be retained as 'unused material', even where the user considers there may be no immediate evidential value in the footage. Failure to do so may lead to an abuse of process argument being lodged.</p> <p>Footage may be shared with other partners if (a) it is proportionate and necessary for law enforcement purposes; <b>and</b> (b) the other partner is a signatory to an authorised information sharing protocol between that partner, Cornwall Council.</p>			
<b>9</b>	<b>Data Flows – describe what data will be shared, with whom and any links with other systems</b> <i>Include a diagram if available</i>			





ASB Team info sharing Checklist



	<p><input type="checkbox"/> We consider what the purpose is for sharing personal data with law enforcement authorities, and whether it is necessary and proportionate to do so.</p> <p><input type="checkbox"/> We identify a lawful basis under Article 6 of the UK GDPR before sharing the personal data. If the sharing of personal data was not the original intention of the processing, we consider whether this new purpose is compatible with that original purpose.</p> <p><input type="checkbox"/> We also identify a condition for processing under Article 9 of the UK GDPR and any relevant condition in Schedule 1 of the DPA 2018 before sharing special category data.</p> <p><input type="checkbox"/> We identify a condition for processing under Article 10 of the UK GDPR and a relevant condition in Schedule 1 of the DPA 2018 before sharing criminal offence data.</p> <p><input type="checkbox"/> We record our lawful basis and, if relevant, our conditions for processing special category or criminal offence data.</p> <p><input type="checkbox"/> We only share the minimum necessary amount of relevant and adequate personal data.</p> <p><input type="checkbox"/> We ensure that the personal data is shared in compliance with our other data protection duties and obligations, including fairness, accuracy and security.</p> <p><b>Criminal Procedure and Investigations Act 1996 (CPIA 1996)</b> - covering the disclosure of material in criminal cases. Images that are relevant to an investigation must be retained in accordance with the Code of Practice issued under Section 23 of the CPIA 1996. Any generated digital images should be accompanied by a full audit trail, from the point of capture of the image throughout the whole management process – including when they are passed to the Council’s legal team or the Crown Prosecution Service or the defence or if there is any supervised viewing.</p>
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Section A (2)	
The data	
10	Who / what is the data about?
	Data will consist of video images and audio files of incidents of crime disorder and ASB, personal threat or assault and any evidence capture that supports any legal proceedings.

<b>11</b>	<b>List the data to be processed</b> <i>e.g. Name, Address, Date of Birth etc. If a large amount of data is to be collected, you may add an appendix listing all the data fields to the end of this document.</i>			
	Video and audio files captured on triggering the device as defined within the BWV Policy procedure.			
<b>12</b>	<b>What are the likely volumes of data?</b> <i>e.g. how many business records, how many people's data?</i>			
	<p>BWV is a relatively new technology and is seen to have major benefits of capturing evidence in an indisputable fashion. Accordingly, there will be more data potentially being captured but the appropriate safeguards, by adherence to legislation and guidance, will ensure that only information that passes a strict test, of being required for a lawful purpose, can be retained. Data will amount to video and audio data collected via the BWV unit of 3 members of staff who during the course of their patrol duties and enforcement activity capture evidence to be retained for the purposes outlined in the Body Worn Video Policy and procedures. Data volume is currently unknown as this will be dependent on the number of enforcement activities and or offences disclosed during the extent of their daily duties.</p>			
<b>13</b>	<b>Are processes and procedures in place to ensure data is accurate and up to date?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>Please give details</i>
	<p>The BWV equipment is a body-mounted camera with a built-in microphone. The camera stores digital files that, once recorded, can neither be deleted nor amended by the operator. Each digital file carries a unique identifier and is time and date stamped throughout.</p> <p>The BWV have a playback function to allow for immediate review of footage directly from the device. The playback function can only be accessed upon successful input of the unique sequenced pass code using the buttons on the device. This minimises the risk of unlawful access to any footage on the device in the event of its theft or loss.</p> <p>4.1 Equipment</p> <p>Equipment must be kept in good working order and it is the responsibility of each trained user to ensure that the equipment is maintained. Any faults or losses must be reported immediately to the ASB Team Manager. If the device has become damaged, or a fault is identified, the user must notify the ASB Team Manager as soon as practicable.</p> <p>The ASB Team Manager or System Administrator reports via DEMS 360 (Digital Evidence Management System - encrypted ) - in the event of a loss, the ASB Team Manager or Community Safety Team Manager will be responsible for carrying out a risk assessment related to the lost device and must inform the Data Protection Manager for Cornwall Council immediately.</p> <p>BWV devices should only be used by trained users and must be stored in line with policy.</p>			

	All users should ensure that the device is clean, including the lens, and is fully charged before operational use. Formal training must be completed before any staff member can use BWV.			
<b>14</b>	<b>Who will access the data?</b> <i>Include each service if more than one service will access the data, list external partners who have direct access to the data, what is the approximate number of users?</i>			
	ASB Team members will have access to their own BWV unit to review footage. Files from BWV units are downloaded and stored on a standalone laptop which can only be accessed by the authorised ASB BWV administrators, preventing unauthorised access to the data.			
<b>15</b>	<b>Where will the data be stored?</b>			
	One standalone computer system (Laptop) that has approved CC IT security requirements and firewall.			
<b>16</b>	<b>Is it being stored within the UK?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>Please give details</i>
	If not, where is it?  EEA/EU <input type="checkbox"/>  Other <input type="checkbox"/> Provide details:			
<b>17</b>	<b>How long will the data be stored?</b> <i>Please refer to the relevant <a href="#">retention schedule</a> for information and list the retention periods.</i>			
	Retention, Storage & Disclosure  Data downloaded as evidential will be retained by Cornwall Council for a minimum of 6 years in line with the Guidance on the Management of Police Information. A 'bit-for-bit' copy of the original footage must be burned, and provided as required, on to a non-rewritable disc which is securely stored in accordance with the Criminal Procedure and Investigations Act 1996, DPA 2018 and UK GDPR.  The use of BWV generates a large amount of digital material that must be stored, retained, reviewed, and deleted appropriately.  To ensure compliance with the above, officers of Cornwall Council ASB Team will use the DEMS 360 video management system to store all recorded footage, which will be automatically uploaded to the secure designated laptop and managed subject to the above. All footage recorded to the BWV device must be downloaded as soon as practicable upon conclusion of the operational use. Once downloaded, the camera is cleared of all footage and ready to be used again. Users must store their personal issue BWV units securely when not in use, devices will be locked away when not in use.			

	<p>All recorded footage is automatically downloaded when the camera is connected to a computer that has DEMS306 software installed and is automatically saved on the secure networked data storage facility.</p> <p>Once the footage is uploaded, the user must decide as to whether the footage is likely to be required at a future point, either as evidence or for some other law enforcement purpose.</p> <p>Any saved evidential footage must then be identified by users entering the IDB reference number in the incident ID column and other details such as exhibit number, suspects, and other relevant details in the notes column.</p> <p>Additional information entered into these fields is searchable and allows future searches to identify and retrieve essential footage. The recording of the IDB reference number ensures that the BWV is indexed and downloaded to DEMS 360 correctly. This is essential in order to locate all footage linked to an incident. BWV should be marked as 'evidential' only when the continued retention is necessary to support an investigation/operation. It must not be marked evidential for the sole purpose of professional development.</p> <p>The Reveal (DEMS) video management system has a full audit capability enabling review of such aspects as search, metadata entry, and playback. All BWV footage should be uploaded to DEMS as soon as possible. This will assist in proving evidential integrity. Footage cannot be deleted from the BWV device prior to the uploading process.</p> <p>It is the responsibility of the BWV user to ensure that evidential footage is correctly downloaded. Data must NOT be downloaded to any device other than designated computers with the DEMS 360 software installed. Any attempt to do so will result in the automated reporting of the incident, and any user found doing so may be liable for prosecution or disciplinary procedures.</p>			
18	<b>Is there a process to identify and review data suitable for destruction and/or deletion? Describe the process and the process to delete or otherwise put the records beyond use</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b>
	<p>It is for the investigating officer to determine whether there is a need to retain BWV data and the period for retention, taking into account the requirements of legislation, policy, and regulations. A failure to review and retain information appropriately may constitute a breach of the relevant legislation and, ultimately, undermine public confidence in the assistance given by officers of Cornwall Council ASB Team.</p> <p>Any information captured on a device, which is deemed to be non-evidential will be automatically deleted after a set period of time not exceeding 31 days, but in most cases will be within the same day (End of duty day). The rationale for any retention beyond an immediate disposal might include circumstances where there is a desire to review any content as part of criminal/legal investigations as part of the Council's procedures, the reporting of these more often occurring the aftermath of any incident and often this material may not have been marked as evidential. Other data</p>			

	within the evidential category will be retained in order to satisfy the requirements of legislation, the court process if applicable and depending on the type of offence, retained, reviewed and disposed of, in accordance with timeframes within the Data Protection Act.			
<b>Section A (3)</b>				
<b>Personal data</b>				
<b>19</b>	<b>Does the data include personal data?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b><u>If No – go to Section A (4)</u></b>
<b>20</b>	<b>What is the legal basis for processing the personal data?</b> <i>Select one</i>	<b>Yes</b>	<b>No</b>	<b>Notes</b>
	<b>Consent</b> If yes, describe how consent will be sought and recorded and attach copies of any consent forms. Individuals must be able to withdraw consent for processing, so describe how they will be able to do so.	<input type="checkbox"/>	<input type="checkbox"/>	
	Processing is necessary for the performance of a <b>contract</b>	<input type="checkbox"/>	<input type="checkbox"/>	
	Processing is necessary for compliance with a <b>legal obligation</b> to which the controller is subject	<input type="checkbox"/>	<input type="checkbox"/>	
	Processing is necessary for the performance of a task carried out in the <b>public interest</b> or in the exercise of official authority vested the controller	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p>Schedule 2 of the Data Protection Act will be met as processing is in the public interest and safety of our staff and to capture potential criminal behaviour including the prevention of crime and disorder. The most likely consideration for meeting a Schedule 3 condition is Section 10 and the associated Data Protection (Processing of Sensitive Personal Data) Order 2000 Sch 1 namely it is in the public interest, necessary for the prevention or detection of crime and must be carried out without consent. An individual would not provide consent to recording at the start of capture if an illegal act was likely to occur to avoid self-incrimination.</p> <p>Applicable Acts:</p>

				Anti-social Behaviour, Crime and Policing Act 2014 Crime & Disorder Act 1998
	Processing is necessary in order to protect the <b>vital interests</b> of the data subject	<input type="checkbox"/>	<input type="checkbox"/>	
	Processing is necessary for the purposes of the <b>legitimate interests</b> pursued by the controller or by a third party	<input type="checkbox"/>	<input type="checkbox"/>	NB. Not for public bodies.
21	<b>Does the data include Special category personal data?</b> <b>Select all that apply</b>	Yes		<b>Notes</b>  Information will be collected using a Body Worn video camera which will record images and sound of any interactions between the Council's ASB Officers and members of the public, [which potentially may include children or other vulnerable groups], whilst undertaking enforcement operations. The purpose of recording is to safeguard ASB Officers and members of the public and to provide good evidence for all parties in the event of complaints or investigations lodged with the Council or any other investigation into enforcement activity, incidents, accidents or alleged assaults. BWV recordings will constitute personal data and its creation, retention and use has been considered under the provisions of the Data Protection Act 1998. Recordings can be requested through subject access requests by following the Council's Access for Personal Information procedure
	Racial or ethnic origin;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Political opinions;	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
	Religious or philosophical beliefs	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Trade union membership	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Genetic data	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Biometric data (where used for ID purposes)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	

	Health	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Sex life;	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Criminal offence data	<input checked="" type="checkbox"/>	<input type="checkbox"/>	
<b>22</b>	<b>What is the legal basis for processing the Special Category Data?</b>  <i>Select one</i>	<b>Yes</b>	<b>No</b>	<b>Notes</b>
	<b>Explicit consent:</b> the data subject has given explicit consent to the processing of those personal data for one or more specified purposes.	<input type="checkbox"/>	<input type="checkbox"/>	
	<b>Employment, social security and social protection law:</b> processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law.	<input type="checkbox"/>	<input type="checkbox"/>	
	<b>Vital interests:</b> 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.	<input type="checkbox"/>	<input type="checkbox"/>	
	<b>Special category group use:</b> 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.	<input type="checkbox"/>	<input type="checkbox"/>	

	<i>Note: this condition is limited to not for profit organisations e.g. churches, trade unions</i>			
	<b>Made public:</b> processing relates to personal data which are manifestly made public by the data subject.	<input type="checkbox"/>	<input type="checkbox"/>	
	<b>Legal:</b> processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity	<input type="checkbox"/>	<input type="checkbox"/>	
	<b>Public interest underpinned by law:</b> processing is necessary for reasons of substantial public interest, on the basis of 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.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<p><i>Please set out relevant section of legislation</i></p> <p>The use of body-worn video, by Cornwall Council is lawful. Common law provides the council with the authority to use BWV in the lawful execution of their duties, for the purpose of the prevention and detection of crime.</p>
	<b>Health and social care:</b> processing is necessary for the purposes of preventive 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 law.	<input type="checkbox"/>	<input type="checkbox"/>	
	<b>Public Health:</b> 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 law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy	<input type="checkbox"/>	<input type="checkbox"/>	



	<b>Archiving/research with safeguards:</b> processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes.  <i>Note: Public interest is required, pseudonymisation would be an appropriate safeguard.</i>	<input type="checkbox"/>	<input type="checkbox"/>	
<b>23</b>	<b>Does your privacy notice cover this processing?</b>  Please provide a link	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> Intranet guidance on <a href="#">Privacy Notices</a> is available  <i>If No, please provide additional information in box below explaining when this work will be complete</i>
	ASB Team Body Worn Video Privacy Notice (See Safer Cornwall ASB Pages to download the Body Worn Video Privacy Notice)  <a href="https://www.cornwall.gov.uk/the-council-and-democracy/website-help-and-information/privacy-policy/">https://www.cornwall.gov.uk/the-council-and-democracy/website-help-and-information/privacy-policy/</a>  <a href="#">Safer Cornwall privacy notice</a>  At the commencement of any recording the user should, where practicable, make a verbal announcement to indicate why the recording has been activated. If possible, this should include: <ul style="list-style-type: none"> <li>- Date, time, and location;</li> <li>- Incident type;</li> <li>- Confirmation, where appropriate, to those present that the incident is now being recorded using both video and audio.</li> </ul> If the recording has commenced prior to arrival at the scene of an incident, the user should, as soon as is practicable, announce to those persons present at the incident that recording is taking place, and that actions and sounds are being recorded.  Specific words for this announcement have not been prescribed, but users should use straightforward speech that can be easily understood by those present, such as:			

	<p>"I am wearing and using a body worn video camera which is recording both video and sound..."</p> <p>"I am recording you...."</p> <p>"I am video recording this incident...."</p> <p>"Everything you say and do is being recorded on video..."</p>				
<b>24</b>	<b>Are processes in place to anonymise data once it no longer needs to be person identifiable?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>N/A</b> <input type="checkbox"/>	<b>Notes</b> <i>Please give details</i>
	Video images and audible records can be screened to protect the data subjects captured. Data that is not of an evidential value is deleted from the system automatically within 31 days.				
<b>25</b>	<b>**Adults' health and social care data, public health and children's health data only**</b>	<b>Yes</b>	<b>No</b>	<b>N/A</b>	<b>Notes</b>
	Is the personal / special category data used for research and planning purposes as well as direct care?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Has the processing been approved by the Confidentiality Advisory Group (sometimes known as Section 251 Group) at NHS Digital?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
	Has the National Data Opt Out been applied?	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	
<b>26</b>	<b>Will you be processing card payments (PCI-DSS credit/debit card payment data)?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>	<b>Notes</b> <i>If yes, then complete question</i>	

<b>27</b>	<b>Which payment method will be used?</b>	<b>Notes</b> <i>Please give details</i>		
	<input type="checkbox"/> E-Commerce transactions <input type="checkbox"/> Mail Order/Telephone Order Transactions <input type="checkbox"/> Payment Card Present Transactions			
<b>Section A (4)</b> <b>System procurement only:</b> <i>This section must be completed for electronic systems (databases etc)</i>				<b>N/A</b> <input checked="" type="checkbox"/>
<b>28</b>	<b>Do you intend to use a system / service already in use by Cornwall Council?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>N/A</b> <input type="checkbox"/>
		<b>Notes</b> <i>If yes, please give details</i>		
<b>29</b>	<b>Will the system / service connect to any other services?</b> <i>If so please identify them. (e.g., does it rely on information stored elsewhere?)</i>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>N/A</b> <input type="checkbox"/>
		<b>Notes</b> <i>If yes, please give details</i>		
<b>30</b>	<b>Who will be responsible for maintaining user accounts within the system / service?</b> <i>This includes Administrator accounts</i>			
<b>31</b>	<b>What data migration plans are in place? Identifying what data is to be retained on legacy system, and for how long (how will legacy system be maintained and patched to ensure ongoing read only access)?</b>			

<b>Section A (5)</b> <b>Power BI requests only:</b>  <i>This section must be completed for requests to use confidential data in Power BI and/or where reports (outputs) are intended to be shared with external parties or 'publish to web'</i>				<b>N/A</b> <input checked="" type="checkbox"/>	
<b>32</b>	<b>Could pseudonymised / anonymised data be used instead of person identifiable data?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, please give details</i>	
<b>33</b>	<b>What was the original purpose and legal basis for collecting person identifiable information or confidential information?</b>  See Q8 above				
<b>34</b>	<b>Does the use of Power BI differ from the original purpose and legal basis of processing person identifiable data?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, please give details</i>	
<b>35</b>	<b>Have you reviewed and amended the privacy notices (in the case changes to the purpose of processing person identifiable information) to ensure the notices are still accurate?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, please give details</i>	
<b>36</b>	<b>Will access rights to the data change as a result of the use of Power BI?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, please give details</i>	
<b>37</b>	<b>Retention and disposal of data in Power BI</b>				

	<b>One off report</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> - Add details regarding how often the report will be run and how long the report will be kept
	<b>Routine requirement</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> -If yes add details below about how the data will be maintained and remain up to date
<b>38</b>	<b>What will happen to the outputs from Power BI?</b>  <i>I.e. will reports be exported to pdf, excel etc? Will other staff be able to download them, or save them? If you intend to share your reports with external parties, or 'publish to web' (the concept for sharing open data) – then a BPIA is required for transparency and governance (even where there is no personal identifiable data (PII) included)</i>			
	<b>Section B</b> <b>Privacy Impact Assessment Screening Questions</b>  <b>This section must be completed for all projects/systems collecting personal data.</b>  <i>If the answers to two or more questions are “yes”, a PIA is required. The PIA will be carried out during an impact assessment meeting</i>			<b>N/A</b> <input type="checkbox"/>
<b>39</b>	<b>Does the project involve the collection of information about vulnerable people (including children)?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, please give details</i>  <i>In this context vulnerable data subjects may include children (who may be unable to knowingly oppose or consent), employees, more vulnerable segments of the population and in any case where an imbalance in the relationship between the position of the data subject and the controller can be identified.</i>

	As BWV can be quite small or discreet and could be recording in fast moving or chaotic situations, individuals may not be aware that they are being recorded. Clear signage must displayed, for example on the BWV wearer's uniform, to show that recording is taking place and whether the recording includes audio. If necessary, BWV wearers will announce the use of BWV. The software enables screening of persons captured within			
<b>40</b>	<b>Does the project involve collecting and processing of special categories of data (sensitive data) including data about criminal convictions?</b>	<b>Yes</b> <input checked="" type="checkbox"/>	<b>No</b> <input type="checkbox"/>	<b>Notes</b> <i>If yes, please give details</i>
	<p>Persons, unrelated to any specific interaction between ASB Officers and any of the categories of persons above, might find their activities captured on a BWV device. To some degree, this is inevitable since a camera lens or microphone is non-discriminatory and captures what is seen or heard. In such circumstances, Cornwall Council ASB Team has adopted a number of safeguards to firstly avoid this where possible and to then follow a number of arrangements to anonymise any data. As previously mentioned, BWV is capable of capturing primary evidence in such a way that it is able to bring a compelling and an indisputable account of the circumstances at that time. This will not replace the needs to capture other types of evidence but will go a considerable way in reducing any ambiguities and should be considered as an additional enforcement aid.</p> <p>BWV will not be routinely recording and monitoring all activity on a continuous basis. To do so would fundamentally breach the privacy of large swathes of the public, who are going about their legitimate lives, as well as the privacy of officers going about their work. This cannot be justifiable from the perspective of proportionality and legitimacy. Added to this, is that current technology is incapable of operating in such a way principally due to a lack of suitable battery life. In addition, such a practice would require the storing, reviewing and then disposal of large quantities of data.</p> <p>The equipment will be worn by uniformed ASB Officers, and the use will be primarily driven by the incidents and circumstances presented to them, or in anticipation of responding to a reported and unfolding incident, or when exercising a specific enforcement power.</p>			
<b>41</b>	<b>Are individuals subject to profiling or automated processing?</b>	<b>Yes</b> <input type="checkbox"/>	<b>No</b> <input checked="" type="checkbox"/>	<b>Notes</b> (see <a href="#">guidance</a> ) <i>If yes, please give details</i> <i>The data subject shall have the right not to be subject to a decision based solely on automated processing, including profiling, which produces legal effects concerning him or her or similarly significantly affects him or her.</i>  <i>Please give details</i>
<b>41.1</b>	<b>If yes, and the processing is based on public task or legitimate interests, how will the data subject be given the right to object?</b> <i>Note: the right to object does not exist if the Council has a compelling reason to continue with the profiling that overrides the rights of the individual or it is required for the establishment, exercise or defence of legal claims.</i>			

42	Is the information processed using automated decision making which could lead to exclusion / discrimination?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Notes <i>If yes, please give details</i>
43	Does the project involve using technology that might be perceived as being privacy intrusive? E.g. the use of biometrics or facial recognition?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Notes <i>If yes, please give details</i>
44	Will the project result in you making decisions or taking action against individuals in ways that can have a significant impact on them?	Yes <input checked="" type="checkbox"/>	No <input type="checkbox"/>	Notes <i>If yes, please give details</i>
	BWV will result in providing video and audio evidence that supports a prosecution against a data subject.			
45	Will the project collect large scale data, either data about a large number of individuals, or extensive data about each individual?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Notes <i>If yes, please give details</i>
	The BWV will only be operated under the strict principles as outlined in the BWV policy procedure, limiting the volume of data that can be collected. Review of data collected will determine if it is marked as evidential value or deleted from the system.			
46	Does the project involve data matching / combining data sets in a way that would exceed individuals' reasonable expectations?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Notes <i>If yes, please give details</i>
47	Does the project involve systematic monitoring (e.g. CCTV in public spaces) which the data subjects may be unaware of?	Yes <input type="checkbox"/>	No <input checked="" type="checkbox"/>	Notes <i>If yes, please give details</i>

	ASB Officers will ensure that where reasonably practicable that the subject(s) are being recorded on the audio visual BVU unit by providing a verbal warning that they are being recorded both video and audio. They will also be uniformed and will wear a visible clothing flash that indicates the use of BVU
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**OFFICE USE ONLY**

<b>Is a Privacy Impact Assessment Required?</b>
<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
<i>If No, please justify and document the reasons for not carrying out a PIA and include / record the views of the Data Protection Officer</i>

**The following section will be completed by the Corporate and Information Governance team so please do not enter any information beyond this point**



## Section C

to be completed by the IG team

### Business Impacts

This outlines the detail of the Business Impact Assessment in tabular form. Only the categories of the [Business Impact Tables](#) that were considered applicable have been included.

The impacts relate to the following areas in each sub-category:

- C** = Confidentiality, i.e. if the data were to end up in the public domain
- I** = Integrity, i.e. if the data were to be corrupted/manipulated and no longer trusted
- A** = Availability, i.e. if the data were lost or wiped/system down and therefore not available for use

Table 1 - Public Safety, Public Order and Law Enforcement						
Sub-Category	Impacts	N/A	No/ Low	Low- Med	Med	High
Impact on life and safety	Confidentiality	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality:  Integrity:  Availability:				
Impact on provision of emergency services	Confidentiality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Comments	Confidentiality:  Integrity:  Availability:				
Impact on crime fighting	Confidentiality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality, Integrity, Availability:  If the data was compromised in any way, it could hinder the investigation of low level crime				
Impact on judicial proceedings	Confidentiality	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality, Integrity, Availability:  If the data was compromised in any way, it could hinder the prosecution of low-level crime.				
Table 2 - Public Services						
Sub-Category	Impacts	N/A	No/ Low	Low- Med	Med	High
Inconvenience and public confidence in public services	Confidentiality	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality, Integrity, Availability:				

		If the data was compromised in any way, it could undermine citizens' perception of the council, but service delivery would be unaffected.				
Public finances	Confidentiality	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality, Integrity, Availability: If the data was compromised in any way, it could cost officer time to rectify				
Non-public finances	Confidentiality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality: Integrity: Availability:				
Services affecting personal safety of citizens (e.g. sheltered accommodation)	Confidentiality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality: Integrity: Availability:				
Services affecting health of citizens (e.g. waste disposal)	Confidentiality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

	Availability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality: Integrity: Availability:				
Services not affecting health or safety of citizens (e.g. library service, land use and planning services)	Confidentiality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality: Integrity: Availability:				
Services in support of the Civil Contingencies Act	Confidentiality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality: Integrity: Availability:				

Table 3 - Personal / Citizen						
Sub-Category	Impacts	N/A	No/ Low	Low- Med	Med	High
Health and safety of the citizen	Confidentiality	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

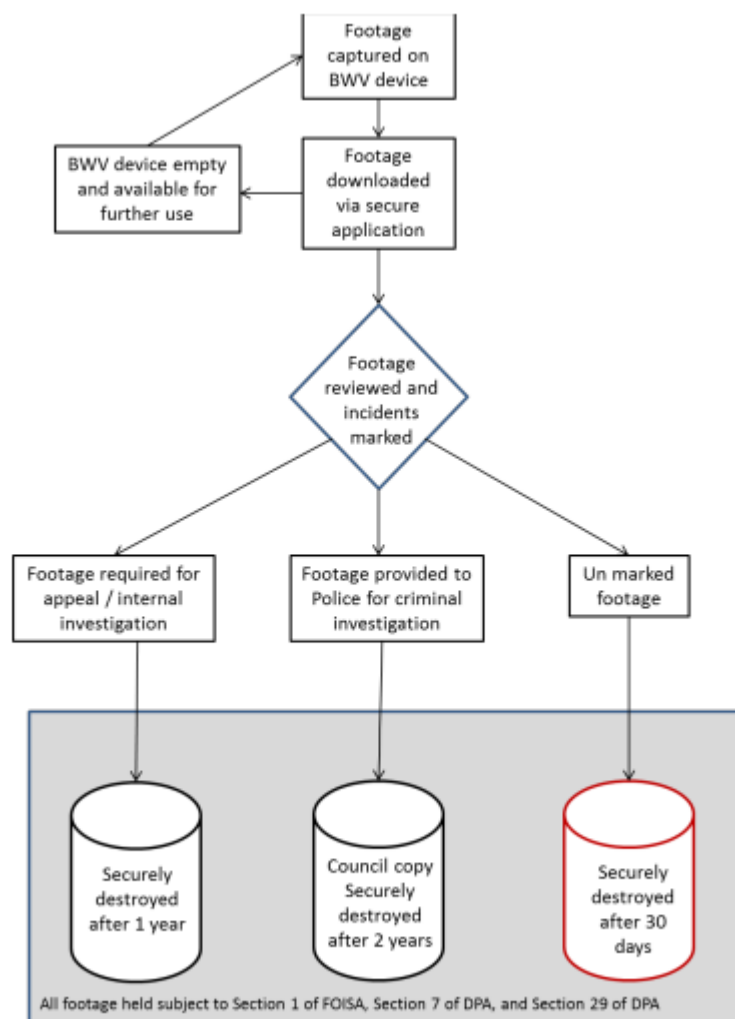
	<b>Integrity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Availability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Comments</b>	Confidentiality:  Integrity:  Availability:				
<b>Privacy of the citizen</b>	<b>Confidentiality</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Integrity</b>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Availability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Comments</b>	Confidentiality, Integrity: If confidentiality or integrity of the data was compromised it would result in the loss of control of people's personal and potentially special category data  Availability: N/A				
<b>Identity of the citizen</b>	<b>Confidentiality</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Integrity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Availability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Comments</b>	Confidentiality:  Integrity:  Availability:				
<b>Personal finance</b>	<b>Confidentiality</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Integrity</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Availability</b>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	<b>Comments</b>	Confidentiality:				

		Integrity: Availability:
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Table 4 - Reputation						
Sub-Category	Impacts	N/A	No/ Low	Low- Med	Med	High
Cornwall Council's reputation (for contextual purposes only)	Confidentiality	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Integrity	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Availability	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
	Comments	Confidentiality, Integrity, Availability: Any compromise would result in local press coverage				

## Appendix A

### Data Flow Map



## Section E

to be completed by IG Team and approved by DPO

### Privacy Impacts

Identify the privacy and related risks:

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

Risk  Describe the source of risk, include associated compliance and corporate risks as necessary.	Consequence(s)  Describe the nature of potential impact on individuals	Risk rating now Low/Medium/High			Mitigation/Recommended Actions	Residual risk rating Low/Medium/High		
		Likelihood of harm	Severity of harm	Overall risk		Likelihood of harm	Severity of harm	Overall risk
Breach of Article 5 (1)(a) processing data lawfully, fairly and in a transparent manner if inadequate privacy notices are provided	Individuals unaware of recording	Low	Low	Low	Ensure individuals are told that they are being filmed	Low	Low	Low
Breach of Article 5 (1)(a) processing data lawfully, fairly and in a transparent manner if conditions for processing are unclear	As above	Low	Low	Low	Ensure individuals are told that they are being filmed	Low	Low	Low



Risk  Describe the source of risk, include associated compliance and corporate risks as necessary.	Consequence(s)  Describe the nature of potential impact on individuals	Risk rating now Low/Medium/High			Mitigation/Recommended Actions	Residual risk rating Low/Medium/High		
		Likelihood of harm	Severity of harm	Overall risk		Likelihood of harm	Severity of harm	Overall risk
Breach of Article 5 (1) (c) processing is adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed (data minimisation)	Data about bystanders could be captured, data unrelated to ASB could be captured	Med	Med	Med	Ensure footage review process is followed	Low	Low	Low
Breach of Article 5(1)( e ) storage limitation principle if retention and disposal of information is not appropriately managed	Data about individuals would be kept for longer than is necessary and pose a privacy risk	Med	Low	Med	Ensure retention periods set out in procedure are followed	Low	Low	Low
Breach of Article 5(1)(f) security principle if chosen supplier does not adequately secure personal data	Data not kept confidential	Med	High	High	Consider Cyber Security Review	Low	Low	Low

3. Sign off and record outcomes		
Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion

Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Simon Mansell 26.06.23	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: Processing approved		
Oversight by SIRO required? <input type="checkbox"/> Yes <input type="checkbox"/> No Oversight by Caldicott Guardian required? <input type="checkbox"/> Yes <input type="checkbox"/> No		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA

The IAO must inform the Corporate and Information Governance team when the actions arising from the Privacy Impact Assessment have been completed.

## Section F:

### Security Assessment

This section is to be completed by the Security Architecture team.

Technical Security Recommendations