



Policy Impact Assessment
(including Equality Impact Assessment)

The purpose of conducting this Policy Impact Assessment is

- to ensure that the activities of the Force when delivering policy, strategy, function or working practice do not have an unjustified and adverse impact on policing minority groups and communities of Devon, Cornwall and Isles of Scilly.
- to ensure that the activities of the Force when delivering policy, strategy, function or working practice does not have an unjustified and adverse impact on its staff, particularly those from minority groups.
- to ensure any new or revised policy, together with its associated **working practices** complies with our obligations, some of which are statutory, in respect of:
 - Reducing Bureaucracy – Section A
 - Freedom of Information – Section B
 - Data Protection – Section C
 - Management of Police Information – Section E
 - Health & Safety/Environmental – Section D
 - Equality and Human Rights Impact (screening decision) – Section F
 - Equality Impact Assessment (full) - Section G

Please complete this form in conjunction with the Force Policy Handbook and assessment guidance notes available on the Force Policy Admin Website or by contacting the Force Policy Admin Team on 22826/22336/22557.

Policy (function/procedure/working practice/strategy) Title and Number	D011 - (CCTV)		
Name and contact details of Assessor	Policy Officer, Ext 23642		
Policy Owner (Department)	Local Policing and Partnership Department		
Portfolio Owner (COG)	ACC Sharon Taylor		
Date of Assessment	6 th March 2014		
Policy Version date (to be completed by Policy Admin)	20 th February 2014		
Verified by : (Policy Officer)	Policy Officer		
Associated working practices :			
Date submitted to Policy Admin	06/05/2014	Check completed and registered	28/10/2014

- **For the purposes of ease of reference 'Policy' as referred to within this Assessment equates to : Policy/Function/Project/Procedure/Working Practice/Strategy/Step by Step Guidance.**

Reducing Bureaucracy – Section A (to be completed for new policies only)

Please complete in conjunction with the guidance notes

1.1 What has changed or emerged to trigger this new policy and are the objectives of the policy clear and linked with Force Strategy?

Policy is not new

1.2 Does the new policy impact unnecessarily on any front-line staff. If it does, how?

1.3 What is the full impact on implementing this new policy? (eg are new processes required/cost implications/bureaucratic burden/risks involved)

Freedom of Information – Section B

Please complete in conjunction with the guidance notes

2.1 Has the Policy been FOI marked in accordance with the relevant exemptions? (Where a paragraph/section is 'Closed' one or more of the 23 exemptions must be identified and justified – for further details see guidance notes)

Yes

Data Protection – Section C

Please complete in conjunction with the guidance notes

3.1 Does the Policy refer to personal information? (i.e. any information which identifies a living individual)

No

If yes please complete the following :

If No – go to Section D

3.2 Please list the personal information that will be collated? (eg name, dob, address etc)

3.3 How will it be collated? (Where will we get the personal information? the individual?)

3.4 Why is it to be collated and how will it be kept up to date?

3.5 Are the time periods for retention of the personal information defined? (See Policy D32)

NOT PROTECTIVELY MARKED

3.6 Is the process for removal and disposal of the personal information defined?

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3.7 Are access controls in place, for the defined personal information, in accordance with the Government Protective Marking Scheme? (ie Not Protectively Marked, Restricted or Confidential) - Please contact the Information Assurance Unit for further guidance. Their contact details can be found on the attached [link](#)

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3.8 If personal information is to be routinely disclosed please identify the relevant lawful basis - (please contact the Data Protection Unit for guidance on this issue) Their contact details can be found on the attached [link](#)

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Records Management and Management of Police Information – Section D
Please complete in conjunction with the guidance notes

4.1 Will the application of this policy generate information which will be held for policing purpose? ie

- Protecting life and property
- Preserving order
- Preventing the commission of offences
- Bringing offenders to justice
- Any duty or responsibility on the police arising from common or statute law

OR

Does it generate formal records? - If it “comprises sufficient content, context and structure to provide evidence of the activity – that is, it contains information that is worthy of preservation in the short, medium or long term”.

This will mainly incorporate the information held to meet **legal** requirements **or** information that is required to be maintained for operational and/or business reasons, e.g. MoPI, PACE, HR Records etc. The managers of your specific business function will provide the guidance on what is encompassed in this scope.

If Yes - list the records generated by this Policy :

No

POLICY PARAGRAPH NUMBER	RECORDS GENERATED	RETENTION PERIOD	AUTHORITY FOR RETENTION

4.2 Does this policy have any connection with :

- Collection
- Recording
- Evaluation and actioning
- Sharing
- Review retention and disposal of information

If No - then this policy does not fall under MoPI requirements - go to Section E

If Yes - does the Policy contain links to documented working practices/guidance covering

roles and responsibilities?
No

Health & Safety/Environmental/Green Agenda – Section E

Please complete in conjunction with the guidance notes

5.1 Does this policy have health and safety implications for the public or for our staff? If yes – are they detailed within a generic risk assessment? (please include GRA reference if a risk assessment has been completed. If not covered by a generic risk assessment – a specific risk assessment should detail any significant risks.)
No implications identified at this time.

5.2 Who has been consulted in respect of health and safety issues? (eg Health & Safety Advisor/Occupational Health/Operations/Federation/Unions)
None

5.3 Has compliance with environmental legislation and the 'green agenda' been considered with respect to this policy? If so, please provide details If not, explain why
Not considered relevant

Equality Impact Screening and Human Rights – Section F

- Initial Impact Screening - decision checklist -

Please complete in conjunction with the guidance notes

(6.1-6.10 - to be completed by Policy Officer/Assessor)

6.1 What is the purpose of the policy?
The Devon and Cornwall Police aims, by working in partnership with other agencies, to bring about safer communities, reduce disorder, crime and the fear of crime and to contribute to the delivery of justice in a way which secures and maintains public confidence. The policing of Devon, Cornwall and the Isles of Scilly will focus on bringing the police and the community together in the fight against crime. As part of this aim the Force is committed to the prevention and detection of crime, the protection of vulnerable communities and preserving the rights of individuals. In pursuit of these commitments Devon & Cornwall Police is committed to use CCTV to prevent and detect crime and protect the rights of individuals.

6.2 Does the policy contain any potential interference with an individual's rights as set out in the Convention Articles listed within the Human Rights Act? (the articles most likely to impact are listed within the guidance notes at Appendix 'A')
Article 8 – Right to respect - private / family life

6.3 Does the policy contain a statement explaining what the specific legal basis is for any

NOT PROTECTIVELY MARKED

potential interference within the Human Rights Act?

Explain in full (including whether the interference is justifiable, necessary and proportionate)

There is potential for an impact on article 8 of the ECHR – Right to respect – private / family life. However, it is considered that the potential interference is justifiable, necessary and proportionate and in full accordance with all relevant legislation, which is quoted at section 2.3 of the policy.

All Force CCTV system installation and operating codes must be fully compliant with appropriate legislation:

- Human Rights Act 1998.
- Data Protection Act 1998.
- Regulation of Investigatory Powers Act 2000 (RIPA).

6.4 What are the positive/adverse impacts of the implementation of the policy?
Explain in full

The CCTV systems covered by this policy are intended to prevent and detect crime and protect the rights of individuals.

6.5 Proceeding to full Equality Impact Assessment?

YES

NO

6.6 Date of screening decision

06/03/14

6.7 Deadline for completing assessment or proposed deferred date

6.8 **If NOT proceeding to a full Equality Impact Assessment, complete ONE of the following :**

6.8.1 Policy Officer's/Assessor's reasons for deciding there is insufficient resource to proceed (eg insufficient time, staff, competing priorities, etc):

6.8.2 Policy Officer's/Assessor's reasons and evidence why it is not necessary to do an assessment on this policy (eg no adverse equality impacts likely within or between equality groups):

no adverse equality impacts likely within or between equality groups

6.9 **Advice taken?**

6.9.1 Has advice been taken from the Equality & Diversity Department?

YES/NO

6.9.2 Date advice taken and contact name within E&D Department

Sent to E & D Unit 06/03/14

6.10 What was the advice provided or reason as to why advice was not sought?

This policy does not appear to have any adverse impact on an individuals Human Rights that hasn't been already mentioned and justified or between equality groups. Other policies are mentioned within this one and will be subject of their own EIA.

Corporate E&D 020514

(6.11 - 6.13 to be completed/verified by Departmental Head / Function Owner or appropriate Chief Officer)

6.11 What level of risk would the organisation be exposed to by not proceeding with an assessment?

Reason to support decision :

There is little risk as the policy does not appear to have any adverse impact on an individuals Human Rights that hasn't been already mentioned and justified.

6.12 **Decision whether to proceed with assessment and supporting comments**

Reason to support decision :

Deadline for completing the assessment or deferred proposed	Date
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6.13 Decision approval by Departmental Head / Function Owner or appropriate Chief Officer:

Name:P J Kennedy

Position held:LPP COMMANDER

Date:06 May 2014

Once completed an electronic copy of this completed form must be sent to Policy Admin