

SUBJECT: CCTV Covering Maria Fidelis Old School (MFOS), HS2 Euston

For the purpose of clarity, I include consideration, covering, Cobourg Street, Starcross Street, and North Gower Street.

Dear LBC,

There are strict requirements set out by the Surveillance Commissionaire, in that, consideration of the impact should be assessed, to determine the necessity for the Video Surveillance System (VSS before deploying the cameras, and proportionality. We should also consider our requirement to comply under Construction (design & management) regulations 2015 (CDM); complying with these key areas ensures our system remains lawful.

In addition, and in support, the introduction of Section 7 of the Crime and Disorder Act 1998 placed a direct responsibility on local authorities to combat crime and anti-social behaviour. This provides a statutory framework enabling local authorities to consider how their services could contribute to reducing crime and disorder, as well as their impact on social and community factors against that affecting crime levels.

HS2 Euston integrates with the local community and works closely with the local authority, therefore we feel it is incumbent upon MDJV to consider the role we play, and therefore our responsibility within the Act.

1. We have also identified an Article 6 lawful basis for the processing of personal data under UK GDPR. This is Legitimate Interests, covering:

- The purpose test; The detection and prevention of crime and public security, and also in the event of an accident/incident to allow immediate and root cause analysis
- The necessity test; We will be recording data for a 30 period, the data recorded will automatically be overwritten at this point. Any visibility of business or residential doorways, windows gardens etc. will be obscured of visibility on install of the cameras, as part of the commissioning process.
- The balancing test; the data will only be recorded, it will not be monitored. The data will only be reviewed in the event of a request for evidence from Police, or Incident/accident occurs.

2. We have considered appropriate DPA 2018 Schedule 1 condition where specifically required for the processing of special categories. The VSS will be utilised for the general security and coverage of our external secure boundry. The scope of the cameras will cover within and outside the boundry in order to identify travel from an intruder, these cameras will not be monitoring passing public, residential or business properties outside of our site boundry.

The data gleaned from the coverage of these interfacing areas will be viewed and treated as collateral intrusion and will be redacted if it is felt any compromise breach could be possible

Our system is tightly controlled, data is only stored for the maximum duration detailed above, and only retained longer in the event of an incident or crime.

The requirement for cameras is recommended by our security provider, but the rules of necessity, and proportionality are applied before deploying the cameras on every occasion.

I hope this information clarifies the control of the data gleaned, it's use, it's parameters and exclusions. Please let me know if further discussion is required.

Kind Regards,

Colin McAnespie



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