



# Data Protection Assurance System Assessment #712

TSIP Use Cases





## Project Details

**Title**

TSIP Use Cases

**Unique Reference**

TSIP Use Cases (172437)

**Description**

The scope of the programme is to trial applications for Smart Cameras and IoT sensors at stations and RIDC. Many events and situations have impact on safety, security, train running, and passenger satisfaction and technology advances, particularly in the fields of video analytics and IoT sensing, are providing the rail industry with a range of potential approaches to addressing operational challenges.

**Milestones**

Requirements Solution design Contract award Environment build Use Case trials Exit and closure

**Project Manager**

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**Senior Responsible Owner**

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**Business Function**

RS - Other

**Data Protection Leads**

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## Assessment Activities

The following timeline shows the activity history for this assessment:

1. Created  
by [REDACTED] [REDACTED] 01/10/2021 11:45:22
2. Status changed to Pre Assessment  
by [REDACTED] [REDACTED] 01/10/2021 11:45:22
3. Status changed to Initial Assessment  
by [REDACTED] [REDACTED] 01/10/2021 11:48:23
4. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED] 01/10/2021 12:41:56
5. Status changed to DP Team Review  
by [REDACTED] [REDACTED] 01/10/2021 12:54:20
6. Status changed to Initial Assessment  
by [REDACTED] [REDACTED] 08/10/2021 13:54:25
7. Paused  
by [REDACTED] [REDACTED] 08/10/2021 14:31:21
8. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED] 08/10/2021 16:35:35
9. Status changed to DP Team Review  
by [REDACTED] [REDACTED] 08/10/2021 16:47:05
10. Unpaused  
by [REDACTED] [REDACTED] 11/10/2021 11:12:12
11. Status changed to Initial Assessment  
by [REDACTED] [REDACTED] 11/10/2021 11:12:18
12. Supporting File 'Connectivity and data flow diagram from Cisco' added  
by [REDACTED] [REDACTED] 10/11/2021 16:02:19
13. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED] 12/11/2021 17:01:55
14. Supporting File 'SAR and Crime Agency' added  
by [REDACTED] [REDACTED] 18/11/2021 11:31:21
15. Status changed to DP Team Review  
by [REDACTED] [REDACTED] 18/11/2021 11:33:34
16. Paused  
by [REDACTED] [REDACTED] 18/11/2021 11:35:32
17. Unpaused  
by [REDACTED] [REDACTED] 18/11/2021 14:41:22
18. Status changed to Initial Assessment  
by [REDACTED] [REDACTED] 19/11/2021 10:28:04
19. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED] 23/11/2021 17:27:48
20. Status changed to DP Team Review  
by [REDACTED] [REDACTED] 24/11/2021 15:49:55
21. Status changed to Initial Assessment  
by [REDACTED] [REDACTED] 07/12/2021 17:41:27
22. Supporting File 'SAR and Crime Agency' removed  
by [REDACTED] [REDACTED] 16/12/2021 11:34:05
23. Supporting File 'Legitimate Interest Assessment' added  
by [REDACTED] [REDACTED] 16/12/2021 11:35:08



24. Supporting File 'Use Case DPAS assessment' added  
by [REDACTED] [REDACTED], 16/12/2021 11:37:45
25. Supporting File 'SAR and Crime Agency 20211210' added  
by [REDACTED] [REDACTED], 16/12/2021 11:38:18
26. Status changed to Legitimate Interest Assessment  
by [REDACTED] [REDACTED], 16/12/2021 11:52:44
27. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED], 16/12/2021 11:59:01
28. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 16/12/2021 12:07:37
29. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 23/12/2021 14:50:31
30. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 24/02/2022 14:17:57
31. Status changed to Full Assessment  
by [REDACTED] [REDACTED], 25/02/2022 08:59:44
32. Supporting File 'Full Assessment Data Flow ANPR' added  
by [REDACTED] [REDACTED], 08/03/2022 17:38:01
33. Supporting File 'Full Assessment Data Flow Analytics' added  
by [REDACTED] [REDACTED], 08/03/2022 17:38:27
34. Supporting File 'Full Assessment Data Flow Surveillance' added  
by [REDACTED] [REDACTED], 08/03/2022 17:39:00
35. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 18/03/2022 10:53:40
36. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 18/03/2022 11:57:07
37. Status changed to Legitimate Interest Assessment  
by [REDACTED] [REDACTED], 23/03/2022 10:54:36
38. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED], 23/03/2022 10:55:42
39. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 23/03/2022 10:57:46
40. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 23/03/2022 15:00:54
41. Supporting File 'Surveillance Privacy Notice Change' added  
by [REDACTED] [REDACTED], 25/03/2022 11:19:30
42. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 25/03/2022 11:58:15
43. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 25/03/2022 13:29:33
44. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED], 25/03/2022 13:40:01
45. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 25/03/2022 13:40:07
46. Status changed to Full Assessment  
by [REDACTED] [REDACTED], 25/03/2022 13:40:29
47. Supporting File 'Legitimate Interest Assessment' removed  
by [REDACTED] [REDACTED], 01/07/2022 17:18:42
48. Supporting File 'Legitimate Impact Assessment v2' added  
by [REDACTED] [REDACTED], 01/07/2022 17:19:14



- 49. Updated  
by [REDACTED] [REDACTED], 01/07/2022 17:21:32
- 50. Paused  
by [REDACTED] [REDACTED], 01/07/2022 17:21:32
- 51. Unpaused  
by [REDACTED] [REDACTED], 01/07/2022 17:27:34
- 52. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 01/07/2022 17:29:46
- 53. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 04/07/2022 11:08:27
- 54. Status changed to Legitimate Interest Assessment  
by [REDACTED] [REDACTED], 04/07/2022 11:24:13
- 55. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED], 04/07/2022 11:24:44
- 56. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 04/07/2022 11:24:49
- 57. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 04/07/2022 11:26:56
- 58. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED], 05/07/2022 16:05:03
- 59. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 05/07/2022 18:08:18
- 60. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 06/07/2022 08:49:11
- 61. Status changed to Legitimate Interest Assessment  
by [REDACTED] [REDACTED], 06/07/2022 10:28:17
- 62. Supporting File 'Legitimate Impact Assessment v2' removed  
by [REDACTED] [REDACTED], 06/07/2022 11:25:10
- 63. Supporting File 'Legitimate Interest Assessment TSIP v220706' added  
by [REDACTED] [REDACTED], 06/07/2022 11:26:49
- 64. Status changed to Surveillance Assessment  
by [REDACTED] [REDACTED], 06/07/2022 11:27:20
- 65. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 06/07/2022 11:27:56
- 66. Paused  
by [REDACTED] [REDACTED], 07/07/2022 14:13:00
- 67. Unpaused  
by [REDACTED] [REDACTED], 11/08/2022 16:12:16
- 68. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 11/08/2022 16:14:44
- 69. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 11/08/2022 16:43:52
- 70. Updated  
by [REDACTED] [REDACTED], 19/08/2022 14:32:33
- 71. Status changed to SRO Approval  
by [REDACTED] [REDACTED], 19/08/2022 14:32:33
- 72. Status changed to Initial Assessment  
by [REDACTED] [REDACTED], 23/08/2022 17:12:09
- 73. Status changed to DP Team Review  
by [REDACTED] [REDACTED], 24/08/2022 12:19:15



- 74. Updated  
by [REDACTED], 01/09/2022 15:40:31
- 75. Status changed to SRO Approval  
by [REDACTED], 01/09/2022 15:40:31
- 76. Status changed to Initial Assessment  
by [REDACTED], 01/09/2022 16:16:03
- 77. Status changed to Surveillance Assessment  
by [REDACTED], 08/11/2022 15:23:37
- 78. Status changed to DP Team Review  
by [REDACTED], 08/11/2022 15:26:53
- 79. Status changed to Initial Assessment  
by [REDACTED], 08/11/2022 15:28:34
- 80. Reminder  
by System, 16/02/2023 08:00:08
- 81. Reminder  
by System, 03/03/2023 08:00:07
- 82. Reminder  
by System, 20/03/2023 08:00:08
- 83. Reminder  
by System, 04/04/2023 08:00:06
- 84. Reminder  
by System, 19/04/2023 08:00:07
- 85. Reminder  
by System, 04/05/2023 08:00:07
- 86. Paused  
by [REDACTED], 04/05/2023 09:20:10
- 87. Unpaused  
by [REDACTED], 04/05/2023 09:24:42
- 88. Reminder  
by System, 25/05/2023 08:00:05
- 89. Paused  
by [REDACTED], 25/05/2023 08:55:21
- 90. Unpaused  
by [REDACTED], 08/06/2023 16:39:06
- 91. Paused  
by [REDACTED], 08/06/2023 16:39:11
- 92. Unpaused  
by [REDACTED], 13/02/2024 09:25:10
- 93. Assessment awaiting action reminder sent  
by System, 28/02/2024 08:00:12
- 94. Assessment awaiting action reminder sent  
by System, 28/02/2024 08:00:12
- 95. Assessment awaiting action reminder sent  
by System, 28/02/2024 08:00:18
- 96. Assessment awaiting action reminder sent  
by System, 28/02/2024 08:00:18
- 97. Assessment awaiting action reminder sent  
by System, 28/02/2024 08:00:24
- 98. Assessment awaiting action reminder sent  
by System, 28/02/2024 08:00:24



- 99. Assessment awaiting action reminder sent  
by System, 29/02/2024 08:00:10
- 100. Assessment awaiting action reminder sent  
by System, 29/02/2024 08:00:10
- 101. Assessment awaiting action reminder sent  
by System, 29/02/2024 08:00:16
- 102. Assessment awaiting action reminder sent  
by System, 29/02/2024 08:00:16
- 103. Assessment awaiting action reminder sent  
by System, 29/02/2024 08:00:21
- 104. Assessment awaiting action reminder sent  
by System, 29/02/2024 08:00:21
- 105. Assessment awaiting action reminder sent  
by System, 29/02/2024 12:05:42
- 106. Assessment awaiting action reminder sent  
by System, 29/02/2024 12:05:42
- 107. Assessment awaiting action reminder sent  
by System, 29/02/2024 12:05:54
- 108. Assessment awaiting action reminder sent  
by System, 29/02/2024 12:05:54
- 109. Assessment awaiting action reminder sent  
by System, 01/03/2024 08:00:12
- 110. Assessment awaiting action reminder sent  
by System, 01/03/2024 08:00:12
- 111. Assessment awaiting action reminder sent  
by System, 04/03/2024 08:00:14
- 112. Assessment awaiting action reminder sent  
by System, 04/03/2024 08:00:14



## Pre Assessment Form

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**Does this system involve personal information of any type?**

Yes

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**What type of personal information does/will this requirement hold or process?**

personal information

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**In terms of personal information, will the requirement process more than a name, username or business email?**

Yes

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**Approximately how many individuals will be affected by this?**

1000 - 10000

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**Where will the personal information be processed?**

The UK

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**Have there been any data protection breaches or incidents for this requirement in the last three years?**

No





## Project Information

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### **Provide a detailed description of the purpose (i.e. business objective) of processing the personal information along with a business justification**

The scope of the project is to trial applications for Smart Cameras and IoT sensors in the Dawlish area on the Western Route. Many events and situations have impact on safety, security, train running, and passenger satisfaction. Technology advances, particularly in the fields of video analytics and IoT sensing, are providing the rail industry with a range of potential approaches to addressing operational challenges.

The cameras will have internal image storage for at least 31 days and built-in analytics capabilities to support the Use Cases. Examples of Use cases include:

- o Safety - Detecting, slips, trips and falls, trespass
- o People Counting - In a queue, In a zone, Flow past a point
- o Object Detection - Mobility aid, guide dog, bicycle
- o Carpark - usage and blocking
- o Litter detection in station and on tracks

Images will be also taken off cameras for separate image processing and analytics, some of this processing will be on local kit at the stations and some 'snapshot' image processing will take place in a cloud service though no images are being stored off site.

The Meraki management platform is a cloud-based service and this platform will have access to all the new cameras including live streaming and video download.

The key objective of the trials is gathering anonymised people activity data for planning and customer services enhancements purposes, establishing a database supporting future analysis.

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### **Describe the processing activities**

The installation and commissioning of the equipment will be undertaken by a subcontractor

The image processing will be undertaken by a subcontractor

The testing and demonstration of the system will involve GWR, Network Rail, and NRT

The project will run for 12 months

Data storage: Around 30 cameras are planned across 3 sites in the Dawlish area on the Western Route.

Image data is stored on the cameras encrypted. These cameras produce non-identifiable non-personal data and pass this to cloud based services. In addition at Dawlish Warren station camera footage will be sent to a GWR Network Video Recorder for them to access alongside footage from their existing cameras.

The architecture will give remote access to the new cameras for live and stored images, analytics data will be presented to users on cloud hosted dashboard

Live streaming of images will be supported by the cameras through the cloud based Meraki camera control platform

There will be approximately 30 cameras across Dawlish station, Dawlish Warren station and Holcombe trackside including pre-existing GWR operated Hanwha cameras at Dawlish.

GWR has agreed that NRT will be the data owner for the Meraki cameras based at Dawlish Warren for the purposes of the Proof of Concept trial.



## Processing Activity

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**Which group of individuals are affected by this?**

Staff  
Sub-contractors  
Members of the public

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**What personal information will be processed?**

Visual images, personal appearance  
Behaviours  
Surveillance (CCTV etc.)  
Other, please specify  
ANPR number recognition in station car parks

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**What legal basis will you rely on for processing the personal information?**

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 (the running of the rail infrastr  
f. Processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party (particularly children). Please Note - this basis cannot apply to process

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**Will any sensitive personal information (also known as special categories) be processed?**

No

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**If you choose consent, do you have a record of consent?**

N/A

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**Who, if any, will be the recipients of this personal information (in whole or in part)?**

Current, past or prospective employers  
Suppliers or service providers

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## Processing Arrangement Security

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**Who is the data controller?**

Network Rail Infrastructure Ltd (NRIL)

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**Will any third party process personal information on behalf of Network Rail?**

Yes

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**Please give details of the third party/ies including the full corporate name(s)?**

NRT's subcontractor (Cisco) will be processing images to produce metrics (eg number of people in a queue) As part of the trials GWR will need access to images from the new cameras to confirm the analytic models Cisco advise they use Amazon AWS to host data but this does not include images, images are only held on the cameras  
Cisco has confirmed the AWS servers are in Ireland

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**Does, or will, Network Rail have a written contract with a third party/ies that will process personal information on its behalf?**

Yes

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**Please give details of the contract and clauses to be used?**

NRT will have a contract with Cisco. The contract with Cisco includes the standard data protection clauses as they are processing images of people which is considered personal data.  
Cisco has confirmed their Non-Disclosure Agreement with NRT means they won't be sharing any output data outside the project  
Data sharing agreements will be in place with each of the TOCs accessing the data - just GWR for this DPAS.

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**Which Network Rail system(s) will process this personal information?**

None - all new processing is being trialled  
There should be no requirement for any personal information to be held on Sharepoint

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**Who is the business system owner for each of these systems?**

N/A as no existing systems being used, on success a new business owner will be identified for any new systems established

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**Will the personal information be transferred outside of the European Economic Area (EEA) or accessed from outside the EEA?**

No

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**What is the retention period for each category of personal information?**

1) Images: Up to 31 days 2) ANPR car numbers: Up to 31 days 3) 6 yrs for any footage held for investigation/SAR purposes

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**What is the retention period for each category of sensitive personal information (if applicable)?**

N/a

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**Have you completed the appropriate information security assessments?**

Yes

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**What technical and organisational measures will be put in place?**

Access controls

Secure transfer over dedicated network

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**If your project requires a data test – are you testing your personal information using dummy data?**

N/A

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**Will any personal information be anonymised?**

Yes

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**Detail what information will be anonymised, at what stage of the processing and how**

The analytics converts personal data, namely the identifiable image of someone, into anonymised metadata 'person object detected at this location'

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**Are you using existing personal information for a new purpose?**

Yes



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## Provide details of how you are using existing personal information for a new purpose

Existing CCTV already captures images of passengers using our stations and staff working there. The project will trial using these images and other images from new cameras to provide customer services enhancements to safety, satisfaction, and efficiency.

For the existing cameras a live stream will be taken to a local image processing platform, for these cameras only the depersonalised analytic data needs to be taken offsite

In addition, for the pre-existing GWR Hanwha cameras and for the project's new Meraki cameras there is a 'snapshot' requirement where a still image will be sent from the camera to a local analytics processing server or a remote cloud based service. This still image is only held for the duration of the processing. For example, local image processing might determine there is unexpectedly a person in view on the track, a still is sent to the more advanced remote processing to determine if that person is wearing PPE, and thus likely to be staff, or not wearing PPE, and thus likely to be a trespasser.

Some image processing is gathering of data for planning and customer services enhancements – changes to 'purpose' and surveillance privacy notice proposed.

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## Where did Network Rail originally obtain the personal information from?

Existing CCTV already captures images of passengers using our stations and staff working there.



## Transparency

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**Is the process likely to be considered intrusive by the individuals or the Media?**

No

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**Will Network Rail be using any technology for the first time which may be considered innovative?**

Yes

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**Provide further details of how technology will be used in an innovative way**

This is an 'innovations' project - the cameras are intelligent with built-in capabilities to, for example, count people in a specified zone. Network Rail will be trialling new analytics capabilities. To support these analytics high resolution cameras are being used and it should be assumed people will be identifiable in the images captured. In line with Network Rail standards, images will be kept for 31 days and then deleted. Some examples of analysing images include:

- a) Is the person wearing Personal Protective Equipment, a safety helmet, the Network Rail orange jacket.
- b) Identification of a passenger with reduced mobility, allowing staff to be better prepared.
- c) Identification of Unattended Luggage as security concern

Please see attached Supporting Files for a spreadsheet of Use Case including the output of a review with the DPO of 'legal basis'

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**Does the process/system involve any automated decisions that could have a significant impact on individuals?**

No

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**Does the processing involve monitoring of any of the following?**

Public spaces e.g. CCTV, dash or bodycams, drones

Employees

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**Is the intention to send marketing email or text messages to individuals?**

No

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**Has provision been made for legal advice in the project budget?**

No

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**Has an external law firm advised on any data protection issues?**

No

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**Will appropriate procedures be in place to handle enquiries, complaints and rights requests or requests for information?**

Yes

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**Will there be an up to date privacy notice in place?**

Yes



## Surveillance Assessment

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### How is the surveillance information collected/recorded?

Automatic Number Plate Recognition (ANPR)  
CCTV Camera including stand alone cameras  
Crowd monitoring  
Suicide prevention technology

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### Please provide further details of the surveillance technology and specify whether audio will be recorded

1) New Meraki and existing Hanwha cameras will be used. Audio detection will be trialled to identify trigger events - fire alarms, whistles, screams, gunshots but not held. No audio will be available for a SAR or crime agency request  
2) Cameras will use ANPR technology to read number plates. Car numbers will be used to track the mix of electric, petrol, and diesel cars using station carparks (no audio)  
3) For ANPR the UK gvt provides a portal for this - similar to checking a car's MOT online  
4) For 'suicide prevention' the ambition is to be able to detect particular behaviour patterns identified by Subject Matter Experts in time for station staff to intervene, the project does not have specific expertise but will be guided by others on this

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### If the captured information links to a data set, what procedures are in place to ensure the data set is kept accurate and up to date?

Until now the project was unaware of any 'suicide threats' data base so has no plans to include this. Should the project scope change to include such external personal data then a DPAS update will be submitted. This is extremely unlikely for the Dawlish area project.

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### What safeguards will be put in place to ensure against unauthorised access?

The access model has been assessed by NRT/Network Rail security, initial assessment is all risks are deemed low with the mitigations planned. Two Factor Authentication will be required for camera access

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### Will Network Rail consult or engage with any other parties (BTP, staff, passengers, public, etc.)?

Yes

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### Please outline a high-level summary of the evidence gathered from the consultation

The Network Rail surveillance steering group reviewed the project and has approved the Surveillance Policy change associated with this project supporting the use of camera analytics for service improvements. Trades unions were informed of this policy change without objections being registered.

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### What impact will the surveillance system have on individuals and their right to respect for private and family life, as set out in Article 8 of the Human Rights Act?

None expected, the station is a public place where there is no expectation of privacy. Cameras will not be placed in sensitive areas eg toilets

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**Please detail what procedures you have in place to handle the rights requests of data subjects as well as third party requests including TOC and law enforcement requests?**

The most likely new cameras to be subject to SAR or crime agency requests are those at Dawlish Warren. Requests relating to Meraki cameras at Dawlish Warren and outside the GWR lease area, expected to be few, will be supported by regional resource already engaged in this type of activity or directly supported by the project as the last resort.  
Please see supporting file 'SAR and Crime Agency' for how the project will support these obligations

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**Do surveillance operating staff receive appropriate training?**

Yes



# Legitimate Interest Assessment

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## Why do you want to process the data?

Improving the railways, provide a better service, efficiency gains as well as improved safety and security and crime detection/prevention.

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## Who benefits from the processing?

The passengers, a better service, and staff, safer delivery.

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## Are there any wider public benefits to the processing?

Quicker response time to an event as the station staff are alerted  
Reputational, a more modern railway, consistency

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## How important are those benefits?

The UK should be the world leader

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## What would the impact be if you couldn't go ahead?

The stations can still function and the existing cameras will provide the safety and security to our passengers. However this service can be improved by responding quicker to passenger needs

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## Would your use of the data be unethical or unlawful in any way?

No

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## Does this processing actually help to further that interest?

Absolutely, we need to process image data to generate the metrics

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## Is it a reasonable way to go about it?

Cameras are already expected in stations, the data is anonymised to produce metrics to improve the efficiencies in the station

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## Is there another less intrusive way to achieve the same result?

Sometimes only. Dumber sensors eg Lidar can be used in some places eg to count people in a queue. More staff monitoring the station and existing CCTV. Image analytics is the most flexible approach building on surveillance camera capabilities

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## What is the nature of your relationship with the individual?

Rail passenger, staff member, subcontractor

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**Is any of the data particularly sensitive or private?**

No, the individual will be aware the images are already being captured

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**Would people expect you to use their data in this way?**

Yes, it is a reasonable expectation that cameras would be used to monitor activity

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**Are you happy to explain it to them?**

An additional Privacy Notice will be provided to explain the project

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**Are some people likely to object or find it intrusive?**

None expected. The project is happy to discuss any concerns people raise

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**What is the possible impact on the individual?**

Many beneficial impacts once trials are shown to be successful

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**How big an impact might it have on them?**

None for most people

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**Are you processing children's data?**

Children would be counted in the same way as adults, no child specific use cases in consideration

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**Are any of the individuals vulnerable in any other way?**

No use cases target any vulnerabilities unless you include suicide risks - this is already over played as all the project is doing in this space is putting a camera at the end of a platform, we have no relevant datascience

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**Can you adopt any safeguards to minimise the impact?**

Yes where negative impacts are understood these can be avoided

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**Can you offer an opt-out?**

No, individuals are not being identified



## Full Assessment

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**Please upload a clear data flow map of the personal information**

assessments/2021/10/01/stmKhag9JGwNrlhWm65hlcRipANmIKucL7qDoRhj.pdf

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**Please upload a copy of the privacy notice you will be providing to data subject**

assessments/2021/10/01/IWvcwUGGcMruxIXRilkR8Uhibi0ajh9UiRPGXq9OH.docx

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**Please detail what procedures you have in place to handle the rights requests of data subjects as well as third party requests including TOC and law enforcement requests?**

The project will fit in with and support the existing Subject Access Request and Crime Agency engagement processes at each camera location. The project will ensure Data Sharing Agreements are in place with third parties where they need access to our camera images - the TOC who runs the station is a likely example,

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**Please confirm what procedures are documented and in place to quickly identify and report personal information incidents or breaches?**

During the project the primary contact will be [REDACTED] ([REDACTED]. [REDACTED]@networkrail.co.uk). In the event of a camera being lost, eg through theft, the project will report this to our DPO - image data on the camera is encrypted mitigating breach risk

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**Is the processing of personal information strictly necessary and proportionate to reach Network Rail's business objective i.e. could this be achieved in another way?**

Yes

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**Could the processing of personal information result in a risk to the individuals involved in the event of a security breach?**

No

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**Are there any further details/information or context which you think we should consider when evaluating the DPIA response?**

It is to be noted that NRT is not asking for an unusual change, The use of processing surveillance images for service improvement is in place at other major infrastructure organisations - Transport for London and Heathrow are examples



## Highlighted Risks

The following risks were highlighted to the Senior Responsible Owner:

- Thanks for completing the data protection diligence for your project. Overall, the process seems proportionate and necessary to the task at hand.  
[REDACTED] [REDACTED] 19/08/2022 13:32
- Lawful, Fair and Transparent – The legal basis for the use of Network Rail surveillance cameras has changed to include 'improve the performance of our public functions'. There is a risk of not being fully informed of how their personal data will be processed. Network Rail's Surveillance (security & systems) policy has been updated to reflect the new purposes of processing. To be fully clear and transparent about how the camera analytics operate, the project team are currently working on a privacy notice and sign.  
[REDACTED] [REDACTED] 19/08/2022 13:32
- Purpose Limitation and minimisation There is a risk that with the change to the purposes of processing, 'use cases' may creep or the data is used for the wrong purposes. The project team have agreed specific 'use cases' for the cameras, guidance and training should be provided to make sure the use of the CCTV is only used for the purposes as described in this assessment. Any additional 'use cases' will require further consultation with the data protection team.  
[REDACTED] [REDACTED] 19/08/2022 13:32
- There is a risk that the data may be used by individuals for the wrong purposes. This can be mitigated by making sure the cameras are only accessed by the appropriately trained staff and documented guidance is provided to make sure the data is used for the purposes it was gathered for.  
[REDACTED] [REDACTED] 19/08/2022 13:32
- Security There is a risk that personal data is not protected against unauthorised or unlawful processing and against accidental loss; destruction or damage, using appropriate technical or organisational measures. This can be mitigated by : Limiting access to the data across the appropriate and trained personnel across NR, TOC and Cisco. Document clear procedures and documentation between the TOC and NR as to who is responsible for the data, handling rights requests, enquiries, complaints and management of a data breach.  
[REDACTED] [REDACTED] 19/08/2022 13:32
- Completion of the NRT Security process. The DP team understand the initial risk assessment marks the risks as 'low or are mitigated by planned actions'.  
[REDACTED] [REDACTED] 19/08/2022 13:32
- Your assessment is now complete. The final step is for the Senior Responsible Owner to accept or reject this project in DPAS to feed onto the register of processing activities. Please don't hesitate to contact us again if you have any queries.  
[REDACTED] [REDACTED] 19/08/2022 13:32



## Supporting Files

The following files and links were added in support of this assessment:

1. [Connectivity and data flow diagram from Cisco \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/173 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/173)
2. [Full Assessment Data Flow Analytics \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/249 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/249)
3. [Full Assessment Data Flow ANPR \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/248 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/248)
4. [Full Assessment Data Flow Surveillance \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/250 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/250)
5. [Legitimate Interest Assessment TSIP v220706 \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/319 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/319)
6. [SAR and Crime Agency 20211210 \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/205 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/205)
7. [Surveillance Privacy Notice Change \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/264 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/264)
8. [Use Case DPAS assessment \( https://systems.hiav.networkrail.co.uk/dpas/supporting-files/204 \)](https://systems.hiav.networkrail.co.uk/dpas/supporting-files/204)