

**Data protection impact assessments**  
template for carrying out a data  
protection impact assessment on  
surveillance camera systems



**Project name:** London Borough of Waltham Forest CCTV Scheme

**Data controller(s):** LBWF Council

**This DPIA template should be completed with reference to the guidance provided by the Surveillance Camera Commissioner and the ICO. It will help you to identify whether the use of surveillance cameras is appropriate for the problem you wish to address, assess the risks attached to your project and form a record of your decision making.**

**1. Identify why your deployment of surveillance cameras requires a DPIA<sup>1</sup>:**

- |                                                           |                                                                   |
|-----------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Systematic & extensive profiling | <input type="checkbox"/> Large scale use of sensitive data        |
| <input checked="" type="checkbox"/> Public monitoring     | <input type="checkbox"/> Innovative technology                    |
| <input type="checkbox"/> Denial of service                | <input type="checkbox"/> Biometrics                               |
| <input type="checkbox"/> Data matching                    | <input type="checkbox"/> Invisible processing                     |
| <input type="checkbox"/> Tracking                         | <input type="checkbox"/> Targeting children / vulnerable adults   |
| <input type="checkbox"/> Risk of harm                     | <input type="checkbox"/> Special category / criminal offence data |
| <input type="checkbox"/> Automated decision-making        | <input type="checkbox"/> Other (please specify)                   |

Closed circuit television (CCTV) is designed to take measures to prevent and detect street crime such as assault, vehicle theft, drugs offences etc. The council is responsible for the siting and monitoring of town centre CCTV. Camera locations are published and signage is visible in all CCTV areas

**2. What are the timescales and status of your surveillance camera deployment?** Is this a proposal for a new deployment, or the expansion of an existing surveillance camera system? Which data protection regime will you be processing under (i.e. DPA 2018 or the GDPR)?

This DPIA is to replace the current document and reflects changes in the DPA 2018. CCTV will fall under the Data protection regime of 2018 and follow all guidelines associated to CCTV, its purpose, use and intentions set out within this DPIA and LBWF Code of Practice.

Traffic Management act 2004  
Transport Act 2000  
London Local Authorities Act 1996 Part 2,  
London Local Authorities Act 2000 Schedule 2  
London Local Authorities and Transport for London Act 2003 Part 2

<sup>1</sup> <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/>

## Describe the processing

### **3. Where do you need to use a surveillance camera system and what are you trying to achieve?**

Set out the **context** and **purposes** of the proposed surveillance cameras or the reasons for expanding an existing system. Provide evidence, where possible, including for example: crime statistics over an appropriate time period; housing and community issues, etc.

London Borough of Waltham Forest Council in partnership with the Metropolitan Police is committed to installing and maintaining comprehensive Closed Circuit Television (CCTV) systems throughout the Borough.

The main objectives of CCTV in Waltham Forest are to:

- help reduce the fear of crime
- help deter and detect crime
- enhance community safety
- assist with traffic management
- assist in supporting civil proceedings
- discourage anti-social behaviour, including alcohol and drug related issues

The system covers public areas such as high streets, car parks, parks, housing, corporate sites i.e. libraries and access control points. We aim to support communities and residents to safeguard while going about their daily lives - providing reassurance to our residents and visitors that the area is a safe place to be and that CCTV can assist with investigations should an incident occur.

The Scheme will be monitored and recorded from a central control room. Secondary monitoring and control facilities may be located at other locations (e.g. police control room and housing schemes, but there are no recording facilities at any location other than the central control room.).

### **4. Whose personal data will you be processing, and over what area?** Set out the **nature** and **scope** of the personal data you will be processing. Who are the data subjects, and what kind of information will you be collecting about them? Do they include children or vulnerable groups, and what is the scale and duration of the processing?

The personal data being processed will primarily be of members of the public whilst within the boundaries of Waltham Forest. As the system covers the Town Hall complex and other public areas and council buildings, staff working for the London Borough of Waltham Forest council may also be recorded going about their working day.

The movements of some vulnerable individuals may be captured in some instances, and as the primary purpose of the system is to reduce, detect or prevent crime, disorder or anti-social behaviour the movements of offenders and victims will also be captured. Young people will also be monitored to reduce incidents and support safeguarding measures for them.

Staff and public (regardless of their status) will easily be aware that CCTV is monitoring the areas as there are a number of clear signs and warnings that CCTV is in use.

The use of the system will remain in line with the list of objectives in the CCTV Code of Practice.

Images are retained on the system for 31 days from the point of recording; unless required for evidential purposes, the images are automatically deleted at that point. Images provided for evidential purposes are kept until notification is received that they are no longer required.

The use of CCTV is deemed proportionate and not in conflict with Articles (8), (9), (10) or (11) of the HRA.

**5. Who will be making decisions about the uses of the system and which other parties are likely to be involved?** Will you be the sole user of the data being processed or will you be sharing it with other organisations or agencies? Record any other parties you would disclose the data to, for what purposes, and any relevant data sharing agreements. Note that if you are processing for more than one purpose you may need to conduct separate DPIAs.

The data obtained by virtue of the system will be the ownership of LBWF and only shared for the purpose of crime and evidence required to identify those person involved in criminal activity. If required, evidence will be provided to authorised external agencies to support their investigations.

Data user include:

1. Data subjects
2. Statutory prosecuting authorities
3. Clients and authorised investigators

Evidential images are shared with MET Police or other external agencies i.e. National Crime Agency (NCA) for the use in investigations of crime, disorder and anti-social behaviour.

Evidential images can also be shared in appropriate circumstances with vehicle insurance companies for the use in investigations of vehicle collisions and insurance claims.

Subject Access Requests can also be made of the system with appropriate images.

**6. How is information collected? (tick multiple options if necessary)**

- |                                                            |                                                           |
|------------------------------------------------------------|-----------------------------------------------------------|
| <input checked="" type="checkbox"/> Fixed CCTV (networked) | <input type="checkbox"/> Body Worn Video                  |
| <input checked="" type="checkbox"/> ANPR                   | <input type="checkbox"/> Unmanned aerial systems (drones) |
| <input type="checkbox"/> Stand-alone cameras               | <input checked="" type="checkbox"/> Redeployable CCTV     |
| <input type="checkbox"/> Other (please specify)            |                                                           |

**7. Set out the information flow, from initial capture to eventual destruction. You may want to insert or attach a diagram.** Indicate whether it will include audio data; the form of transmission; the presence of live monitoring or use of watchlists; whether data will be recorded; whether any integrated surveillance technologies such as automatic facial recognition are used; if there is auto deletion after the retention period. You may have additional points to add that affect the assessment.

- Images are collected and recorded 24/7 via encrypted network accessible only from the dedicated premise
- Live images are monitored at LBWF CCTV Operations Centre by Security Industry Authority (SIA) licenced staff
- All recorded imaged are stored locally on premise and retained for 31 days.

- All recorded images after 31 Days are automatically overwritten
- No facial recognition or intergrated technology is used

### 8. Does the system's technology enable recording?

Yes       No

If recording is enabled, state where it is undertaken (no need to stipulate address, just Local Authority CCTV Control room or on-site will suffice for stand-alone camera or BWV), and whether it also enables audio recording.

Recording is conducted at London Borough of Waltham Forest Local Authority Town Hall Complex. No audio is recorded through the use of CCTV.

### 9. If data is being disclosed, how will this be done?

- Only by on-site visiting
- Copies of footage released (detail method below, e.g. encrypted digital media, via courier, etc)
- Off-site from remote server
- Other (please specify)

If any information is required; a formal request must be made in writing via to the CCTV Operations Centre . Requests are then checked and authorised by the Single Point of Contact. A review is then conducted by a fully trained and SIA licenced CCTV operator in our secure facility. If the incident in question is identified, related images will be downloaded and copied onto an encrypted storage device or disc. The requester will then be notified via email regarding completion and a collection date and time will be agreed. On agreed arrival for the collection of encrypted data, the responsible party will show identification before being allowed access to our secure facility. They will then sign our visitors' book to ensure we have a record of their arrival and departure in written format. The identified party will then need to sign the relevant release papers; they are then free to take the evidence from the building.

Data is issued physically on DVD or USB storage drive.

Encrypted USB drives are sent Special delivery to the requester and issued a secure password seperately to access the data.

DVD discs are issued by LBWF Operations Centre and display a unique reference number which is documented on the data issue form on release.

All documentation and forms associated to the release of data must be completed and signed for prior to release.

USB Devices must be new in condition and in original sealed packaging, no other devices will be accepted.

DVD disc are issued by the WF Operations Centre and no other discs will be accepted.

#### 10. How is the information used? (tick multiple options if necessary)

- Monitored in real time to detect and respond to unlawful activities
- Monitored in real time to track suspicious persons/activity
- Compared with reference data of persons of interest through processing of biometric data, such as facial recognition.
- Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software
- Linked to sensor technology
- Used to search for vulnerable persons
- Used to search for wanted persons
- Recorded data disclosed to authorised agencies to support post incident investigation, including law enforcement agencies
- Recorded data disclosed to authorised agencies to provide intelligence
- Other (please specify)

## Consultation

### 11. Record the stakeholders and data subjects you have consulted about the deployment, together with the outcomes of your engagement.

<b>Stakeholder consulted</b>	<b>Consultation method</b>	<b>Views raised</b>	<b>Measures taken</b>
Local residents	Local residents were consulted with regards to the CCTV strategy in March 2020	780 residents provided feed back on CCTV cameras and benefits for their purpose	Formed part of the Council 5 year strategy towards community Safety and CCTV
WF Anti Social behaviour team	Form part of the PSPM group	Discussed monthly	Formed part of the Council 5 year strategy towards community Safety and CCTV
WF Neighbourhoods rteam	Form part of the PSPM group	Discussed monthly	Formed part of the Council 5 year strategy towards community Safety and CCTV
WF Community Safety	Form part of the PSPM group	Discussed monthly	Formed part of the Council 5 year strategy towards community Safety and CCTV
WF Housing	Form part of the PSPM group	Discussed monthly	Formed part of the Council 5 year strategy towards community Safety and CCTV
MET Police	Form part of the PSPM group	Discussed monthly	Formed part of the Council 5 year strategy towards community Safety and CCTV
External Housing Providers	Work with a number of private housing for the provision of CCTV and safety within the area	CCTV supports the ongoing ASB and fly-tipping issues experinced within these specific areas.	Formed part of the Council 5 year strategy towards community Safety and CCTV

Local Businesses	Businesses were consulted with regards to the CCTV strategy in March 2020	Responses received advising that the Council CCTV acts as a deterrent and helps deduce the fear of crime	Formed part of the Council 5 year strategy towards community Safety and CCTV
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## Consider necessity and proportionality

**12. What is your lawful basis for using the surveillance camera system?** Explain the rationale for your chosen lawful basis under the relevant data protection legislation. Consider whether you will be processing special categories of data.

GDPR Article 6 (1) (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

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.

Under section 163 of the Criminal Justice and Public Order Act 1994.

**13. How will you inform people that they are under surveillance and ensure that they are provided with relevant information?** State what privacy notices will be made available and your approach to making more detailed information available. Consider whether data subjects would reasonably expect to be under surveillance in this context.

London Borough of Waltham Forest CCTV Signage advising of the scheme is installed at key locations around the borough and provide details of the scheme and contact details

Information on the purpose/use will also be published on the public website which will include Code of Practice, Operational Procedures and list of Town Centre cameras installed.

**14. How will you ensure that the surveillance is limited to its lawful purposes and the minimum data that is necessary for those purposes?** Explain the adequacy and relevance of the data you will be processing and how it is limited to the purposes for which the surveillance camera system will be deployed. How will you know if it is delivering the benefits it has been deployed for?

Main purposes of the CCTV system is to provide the Police and enforcement agencies with assistance to detect, deter and prevent crime and disorder; to help identify, apprehend and prosecute offenders; to provide the Police/Council with evidence to enable criminal and/or civil proceedings to be brought in the courts; and to maintain public order.

Images must be adequate for the purpose of the system. For the prevention and detection of crime, the images should be capable of identifying/recognising individuals who may be suspects or witnesses to a criminal offence or matter. This would include type of clothing and vehicle details such as make, model and registration numbers.

For general public safety monitoring the majority of images would be unidentifiable in relation to personal data unless the camera was being used to monitor an incident.

### 15. How long is data stored? (please state and explain the retention period)

Evidence supplied to the police for criminal cases is retained for 2 years. All Cloud services provided a maximum of 31 days footage, after this point data is automatically deleted from the Cloud services server.  
All other footage that is not used is automatically overwritten from the secure network servers after 31 days.

### 16. Retention Procedure

- Data automatically deleted after retention period
- System operator required to initiate deletion
- Under certain circumstances authorised persons may override the retention period, e.g. retained for prosecution agency (please explain your procedure)

All Cloud services provided a maximum of 31 days footage, after this point data is deleted from the Cloud services server.  
All other footage that is not used is automatically deleted off servers after 31 days.

### 17. How will you ensure the security and integrity of the data? How is the data processed in a manner that ensures appropriate security, protection against unauthorised or unlawful processing and against accidental loss, destruction or damage? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

Data is held in the OPS centre 24/7 under the control of SIA accredited officers. Each officer has a individual login to access images to release. Any downloaded material is saved to a networked secure drive only accessible by trained and authorised staff. Processes are in place to ensure data processing and issuing complies with set procedures. The issue of data requires the request to be approved and relevant documentation completed for data to be issued.

The LBWF also utilises Cloud Services to store data for various locations around the borough. The information is accessed via a secure website requiring user authentication and login credentials to access the relevant data images.

To ensure privacy of data the system has the following safeguards.

1. Secure premises and restricted access
2. Automated digital data deletion process
3. Evidence handling procedures
4. Privacy masking on cameras
5. Regular privacy checks

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6. Inspectorate certification and audit
7. System and network security processes
8. Can provide physical screens on locations

**18. How will you respond to any subject access requests, the exercise of any other rights of data subjects, complaints or requests for information?** Explain how you will provide for relevant data subject rights conferred under the legislation. You must have procedures in place to respond to requests for camera footage in which a subject appears, and to respond to any other request to meet data protection rights and obligations.

All subject access requests can be submitted through the public web site <https://www.walthamforest.gov.uk/search/site/SAR>. All requests submitted are centrally logged by the Information officer and triaged to the appropriate service for actioning.

**19. What other less intrusive solutions have been considered?** You need to consider other options prior to any decision to use surveillance camera systems. For example, could better lighting or improved physical security measures adequately mitigate the risk? Does the camera operation need to be continuous? Where you have considered alternative approaches, provide your reasons for not relying on them and opting to use surveillance cameras as specified.

Other solutions are considered including the use of additional council resources such ASB and Neighbourhoods teams. Where possible, support with increased police patrols and work with other agencies are considered prior to installation of CCTV.

Statistics on incidents occurred are considered and contribute towards the decision of CCTV and consultation with residents in the localised area forms part of the requirement.

**20. Is there a written policy specifying the following? (tick multiple boxes if applicable)**

The agencies that are granted access

How information is disclosed

How information is handled

Are these procedures made public?       Yes       No

Are there auditing mechanisms?       Yes       No

If so, please specify what is audited and how often (e.g. disclosure, production, accessed, handled, received, stored information)

All associated documentation advertised on the public website are reviewed and updated annually to ensure any relevant changes to process, procedure and legislation are reflected.

CCTV Code of Practice and Self Assessment of the system is undertaken on an annual basis and supported by the SSAIB. The Operators Procedures Manual is reviewed on a two yearly basis or as individual processes as required.

## Identify the risks

Identify and evaluate the inherent risks to the rights and freedoms of individuals relating to this surveillance camera system. Consider, for example, how long will recordings be retained? Will they be shared? What are the expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective? Could it interfere with other human rights and freedoms such as those of conscience and religion, expression or association. Is there a risk of function creep? Assess both the likelihood and the severity of any impact on individuals.

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
Privacy	Remote, possible or probable Possible	Minimal, significant or severe Severe	Low, medium or high Medium
Recording of personal data	Possible	Severe	Medium
Retention and deletion of data	Possible	Severe	Medium
Excessive or inappropriate monitoring	Possible	Severe	Medium

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
Data handling and provision	Remote, possible or probable Possible	Minimal, significant or severe Severe	Low, medium or high Medium
Sharing of information	Possible	Severe	Medium

## Address the risks

Explain how the effects of privacy enhancing techniques and other features mitigate the risks you have identified. For example, have you considered earlier deletion of data or data minimisation processes, has consideration been given to the use of technical measures to limit the acquisition of images, such as privacy masking on cameras that overlook residential properties? What security features, safeguards and training will be in place to reduce any risks to data subjects. Make an assessment of residual levels of risk.

**Note that APPENDIX ONE allows you to record mitigations and safeguards particular to specific camera locations and functionality.**

<b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk</b>			
<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved?</b>
Privacy - CCTV will be installed and directed away from residential property to avoid intrusion. If required, CCTV privacy zones will be configured to obscure images from residential properties where cameras have the potential of viewing into residential property. Signage will be erected at CCTV location advising the use of CCTV and scheme owner including contact details	Eliminated reduced accepted  Reduced	Low medium high  Low	Yes/no  Yes
Recording of personal DATA - Images of those persons accessing the site will be captured and only used for the purpose of crime investigation and post incident analysis. Access to this information is restricted to authorised/trained staff and governed by the Code of Practice and operational procedure is the use of CCTV	Reduced	Low	Yes
Retention and deletion of data - Data is retained for 31 days only after which it will be overwritten. Access to this data is restricted to authorised trained staff.	Reduced	Low	Yes

Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
Excessive or inappropriate monitoring - Staff are governed by the LBWF Code of Practice and Operational procedures. Appropriate monitoring and use of equipment will be in accordance with the relevant procedures. Audit capabilities are available to identify camera use by operators.	Eliminated reduced accepted  Reduced	Low medium high  Low	Yes/no  Yes
Data handling and provision - Data handling and issuing is governed by the Code of practice. The process in which data is handled and issued is outlined within the procedure and only conducted by authorised trained staff in accordance with procedure.	Reduced	Low	Yes



## Authorisation

If you have not been able to mitigate the risk then you will need to submit the DPIA to the ICO for prior consultation. [Further information](#) is on the ICO website.

<b>Item</b>	<b>Name/date</b>	<b>Notes</b>
Measures approved by:	John Hubbard (Director Commercial & Innovation)	Integrate actions back into project plan, with date and responsibility for completion.
Residual risks approved by:		If you identify a high risk that you cannot mitigate adequately, you must consult the ICO before starting to capture and process images.
DPO advice provided by:	Heidi Balci (Deputy DPO)	DPO should advise on compliance and whether processing can proceed.
Summary of DPO advice Risk mitigation is proportionate to the undertaking. The service should review the DPIA on a 12 month basis or sooner where changes are made.		
DPO advice accepted or overruled by: (specify role/title)	N/A	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:		

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This DPIA will be kept under review by: Operations Centre Manager		The DPO should also review ongoing compliance with DPIA.
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## APPENDIX ONE

This template will help you to record the location and scope of your surveillance camera system and the steps you've taken to mitigate risks particular to each location.

**Location:** Each system operator/owner should list and categorise the different areas covered by surveillance on their system. Examples are provided below.

Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
Town centre	Bosch MIC, 360 Vision Indigo Vision Redvision Pelco	119	24hrs	24hrs (only maximum 2 operators) – likely average patrol conducted hourly	The privacy level expectation in a town centre is very low; our town centres are well signed with appropriate signage for CCTV its use and purpose with contact details.
Parks	Bosch MIC, 360 Vision Indigo Vision Redvision Pelco Samsung	43	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	The privacy level expectation in a public park is low, these areas are well signed with appropriate signage for CCTV its use and purpose with contact details
Leisure	Bosch MIC, 360 Vision Indigo Vision Redvision Pelco Samsung	8	24hrs	May have own monitoring and site security capability. 24 hrs – patrols every shift and as required based on intelligence or other information	These are patrolled every shift for site security, administration, public and property and staff safety purposes and can be viewed remotely at the LBWF control room and/or monitored locally by authorised staff/security. .
Housing estate (street and Internal)	Bosch MIC, 360 Vision Indigo Vision Redvision Pelco Samsung	264	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	Cameras are installed on high crime or ASB area estates in order to assist in crime detection and incident and estate management. They may also be installed as part of new estates overall security and safety measures in regeneration projects. Usually PTZ cameras but may include some fixed camera types for specific view point capture. These areas are well signed with appropriate signage for CCTV its use

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Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
					and purpose with contact details. However all recording and evidence downloads are locked down and only managed by LBWF staff/ police
Council buildings, Depots and industrial sites	Bosch MIC, 360 Vision Indigo Vision Redvision Pelco Samsung	408	24hrs	May have own monitoring and site security capability. 24 hrs – patrols every shift and as required based on intelligence or other information	Cameras are installed in civic buildings, libraries, depots etc for site security, administration, public and property and staff safety purposes and can be viewed remotely at the LBWF control room and or monitored locally by authorised staff/security. These areas are well signed with appropriate signage for CCTV its use and purpose with contact details However all recording and evidence downloads are locked down and only managed/accessed by authorised Operations Centre staff/ police
Bike sheds	Indigo Vision Samsung	17	24hrs	24 hrs – patrols every shift and as required based on intelligence or other information	The privacy level expectation in a Bike sheds is very low, our town centres and high streets. These areas are well signed with appropriate signage for CCTV its use and purpose with contact details. However all recording and evidence downloads are locked down and only managed by LBWF staff/ police. Users of the bike sheds are also informed of the security levels involved at the locations at the application stage

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Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
RDC	Axis Vemotion	23	24HRS	Patrols every shift and as required based on intelligence or other information	Cameras are installed as needed for taskings to deal with Fly tipping or ASB and for security, administration, public and property and staff safety purposes and can be viewed remotely at the LBWF control room and or monitored locally by authorised staff/security. These areas are well signed with appropriate signage for CCTV its use and purpose with contact details However all recording and evidence downloads are locked down and only managed by Ops centre staff/ police
ANPR		1	24hrs	This allows entry and exit to the site via this entrance only. Low risk on GDPR as all details are collected on a standalone server and all are deleted when removed from the list. The switch and radio cabinet is store in a secure location with a code fob entry only.	The privacy level expectation for the ANPR is very low, compared our town centres and high streets. These areas are well signed with appropriate signage for CCTV its use and purpose with contact details. However, all recording, and evidence downloads are locked down and only managed by LBWF staff/ police.

## APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



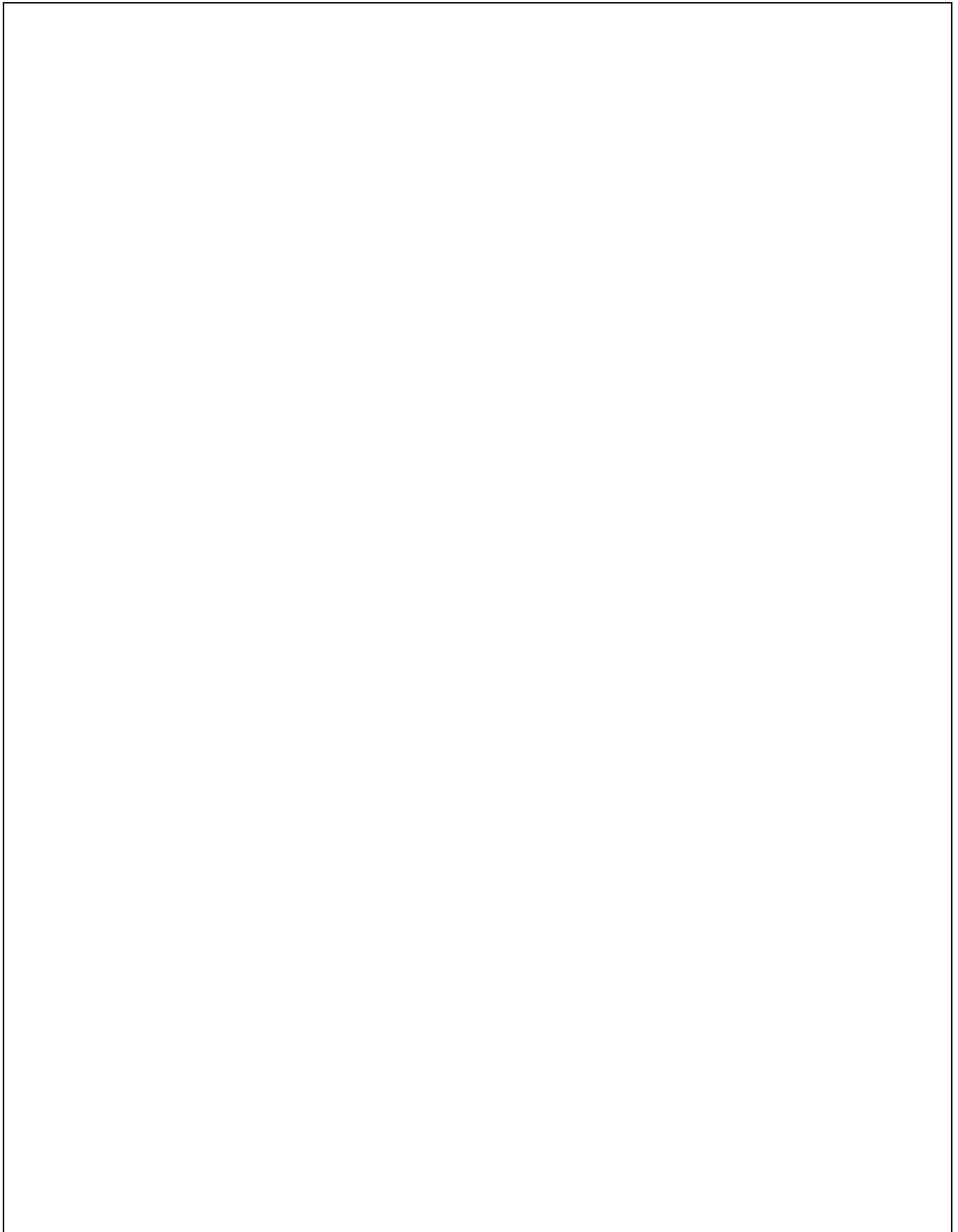
## APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

Use this risk matrix to determine your score. This will highlight the risk factors associated with each site or functionality.

### Matrix Example:

	Camera Types (low number low impact – High number, High Impact)									
	→									
Location	Green	Green	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange
Types	Green	Green	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange
A (low impact)	Green	Green	Green	Orange	Orange	Orange	Orange	Orange	Orange	Orange
Z (high impact)	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange	Orange
	Orange	Orange	Orange	Orange	Red	Red	Red	Red	Red	Red
	Orange	Orange	Orange	Orange	Red	Red	Red	Red	Red	Red
	Orange	Orange	Orange	Orange	Red	Red	Red	Red	Red	Red
	Orange	Orange	Orange	Orange	Red	Red	Red	Red	Red	Red

## NOTES

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