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| PRIVACY IMPACT ASSESSMENT. |
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| CDC PIA COVERING CHICHESTER CITY, PETWORTH, SELSEY, WITTERING, BOSHAM & MIDHURST  |
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CHICHESTER DISTRICT COUNCIL www.chichestercity.gov.uk

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**CHICHESTER CCTV – Privacy Impact Assessment**

Using CCTV can be privacy intrusive, because it is capable of putting law-abiding people under surveillance and recording their movements as they go about their day to day lawful activities. Careful consideration should be used whether to use it, or not; the fact that it is possible, affordable and has public support should not be the primary motivating factor. The authority should take into account what benefits can be gained, whether better solutions exist, and what effect it may have on individuals.

Chichester District Council considers these matters objectively as part of an assessment of the scheme’s impact on people’s privacy.

Chichester District Council owns and operates a CCTV surveillance system in its city centre & surrounding areas. The system was installed in 1996 and has expanded since then to form the large system it is today. The District Council now acts in partnership with Sussex police. There are various questions that need to be answered to successfully provide a privacy impact assessment; those questions are outlined below in a table format.

Where the system will be operated by or on behalf of a public authority, the authority will also need to consider wider human rights issues and in particular the implications of the European Convention on Human Rights, Article 8 (the right to respect for private and family life).

If this is not the case then it would not be appropriate to use CCTV

**CCTV – Privacy Impact Assessment**

**Chichester District Council**

Date of Assessment: February 2018

Person responsible: Sonya Webley

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Considerations:

1. Organisation’s purpose for using CCTV and the issues the system aims to address.

**A.** Anti-Social Behaviour, crime, violent behaviour, community safety.

2. Can CCTV technology realistically deliver these benefits?

**B.** In part when combined with other measures which may include but are not restricted to police response, lighting control, licencing control, enforcement officers, PCSO involvement, shop and pub watch etc.

3. What are the views of those under surveillance?

**C.** Prior (than 2009) installations are inherited and it is not known what public consultation, if any, took place. Hence these cameras are being re-assessed on the basis of current public expectations and perceptions. For example if cameras are installed in an area where there is a vibrant night time economy and have been in position for many years we will not seek public consultation but *will* fully assess them to ensure they are still fit for what is deemed their original purpose.

4. Have other less privacy-intrusive solutions such as improved lighting been considered?

**D.** Improved, (or reducing) lighting has been included in the assessment.

**E.** More intensive police patrolling

**F.** Licensing incentives,

**G.** Cameras which do not stray from the area of objectivity

**H.** Privacy zones on cameras

5. What are the benefits to be gained by using CCTV?

**I.** Reduction in most crime types

**J.** Feeling of safety, (public confidence)

**K.** Deterrence of crime

**L.** Protection of Property, (public & private)

**M.** Increase in prosperity of the area, (a safer place is more likely to be patronised)

6. What are the privacy issues arising from this surveillance camera system

**N.** Consideration that the specific camera does not have the capability to intrude beyond that which is for its specific purpose.

**O.** That private dwellings are protected from cameras having the ability to look, for example into bedroom windows or back gardens, (noting the expectation of privacy is normally less to the frontage of a property which is continually exposed in any event).

**P.** Signage has to be prevalent to advise all users of the areas where CCTV is in use

7. What privacy design features will be adopted to reduce privacy intrusion.

**Q.** Privacy zones, a) electronic as part of the cameras programming.

**R.** Avoiding the use of camera which has the capability to invade privacy beyond the cameras objectives, (or the turning off of such design features).

8. What organisations will be using the CCTV images and who will take legal responsibility for the data under the Data Protection Act 1998?

**S.** All CCTV images are controlled under current legislation in accordance with the Data Protection Act 1998 and all data movement is fully documented. Organisations are not limited to the police and can include other bodies with enforcement powers, (such as customs and excise and some council departments)

9. Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?

**T.** Cameras have been assessed to be ‘fit for purpose’. For example if a camera is being used in a park where there is no lighting or it is poor, white lighting or infra-red is deployed.

**U.** The criteria to enable the identification is dictated by home office recommendation, (10% detection, 25% observation, 50% recognition & 100% identification). Cameras are assessed to have the ability to meet the objectives of each of the four stages.

10. Will the CTV equipment being installed and the system work being adopted be sustainable? Is there sufficient funding for the scheme?

**V.** Any new installation is assessed for both compatibility with the existing system and as advanced as can be afforded but still considers the objectives. Cameras will not be specified that, (as far as can be ascertained) are likely to be obsolete or become unfit for purpose in the near future.

**W.** No new installation will take place unless there is an existing revenue or identifiable revenue stream to support it.

11. Will the particular system/equipment being considered deliver the desired benefit now and remain suitable in the future?

**X.** New installations are assessed to be fit for the purposes, (pressing need) for which they are being installed. (Or in the case of the older inherited cameras what it was deemed they were originally installed for).

**Y.** A new installation, (from individual cameras to the entire infrastructure) is assessed and risk managed by adopting ‘industry standards’ and the use of common platforms.

12. What future demands may arise for wider use of images and how will these be addressed?

**Z.** All existing cameras are assessed on the current objectives which derive from the current pressing need. As, (and if) future demands change a new assessment will take place to determine the suitability of any equipment specified.

**Section 2 Human Rights Act 1998**

1. Is the system established on a proper legal basis and is it operated in accordance with the law?

Comment: How the CCTV system operates is fully documented and documentation is fully available to auditing commissioners.

 The authority also publishes and distributes, (via Gateways, libraries and on its website) a public ‘CCTV Code of Practice’ which sets out how public space surveillance is carried out and how the data it captures is used.

 This assessment includes a review of the ‘CCTV Code of Practice’ and will make any appropriate alterations as a consequence of changing legislation or improved working practices.

2. Is the system necessary to address a pressing need, such as public safety, crime prevention or

National security?

Comment: The assessment process as is documented here is carried out to ensure that the pressing needs for the system in its entirety, groups of or individual cameras was originally introduced are still valid.

 Completion of this assessment confirms the necessity of the system to address pressing needs such as public safety, crime prevention and National Security.

3. Is it justified in the circumstances?

Comment: The severity of the circumstances will vary but this assessment seeks to determine if the use of CCTV is proportionate. (See 4 below).

4. Is it proportional to the problem that it is designed to deal with?

Comment: This is determined by the results of the assessment. However a problem is subjective. For example one person may find a group of 50 motorcyclists gathering on a playing field every Sunday is upsetting and feels CCTV should be employed but others feel that as its one day a week it doesn’t worry them. Therefore the assessment should look at using the CCTV *just* on the Sunday, (if at all) as it’s not meeting its objectives the other six days of the week but is still recording innocent and legal users of the playing field. The assessment may also determine that measures other than CCTV could resolve the issue, such as locking the gate to the field or prohibiting motor vehicles. Thus, concluding that CCTV is not proportionate.

5. Do any of these measures discriminate against any particular section of the community?

Comment: The assessment considers all Equality & Diversity implications. Part of the PIA is public consultation and no strata of society are excluded at any stage. Crime statistics are obtained to help determine the appropriateness of CCTV and on no occasion is race, creed or colour a deciding factor.

 If a crime is being committed and recorded on CCTV it is the crime itself that is being recorded and not the perpetrator or victim.

The assessment may consider an area of high crime, (determined statistically) might benefit from CCTV, with or without other measures. That the area might be one of high crime would be one of the deciding factors and if the majority of residents were of a particular creed or colour it would have no bearing on the assessment.

This also applies to areas of deprivation. The assessment considers only the pressing need and does not include deprivation as a reason to introduce CCTV.

Assessments should be at least annually and kept on file for as long as the system is in use.

Assessments should be made when there is a change. You should not wait until a year has expired since the last one. This is especially important if a camera is changed as it is often likely to be of a different type and may stray from your original objectives or become more intrusive.

**Privacy Impact Assessment for CCTV in the city of Chichester and surrounding areas.**

Date: February 2018

Review Date: February 2019

Manager conducting Assessment: Sonya Webley Enigma CCTV

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| **DPA 1998** |

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| What organisations will be using the CCTV images? Who will take legal responsibility under the Data Protection Act?  |

 | Chichester District Council and Sussex Constabulary are the main users of the CCTV system. CDC will be the Data Controller at the point of images being recorded, however, if these images are seized by the Constabulary or any other statutory body then the legal responsibility will be transferred to that body as the data controller for the images that have been seized  |
| What is the organisation’s purpose for using CCTV? What are the issues that the system aims to address?  | The Council’s CCTV Service was created in 1996 to combat public order offences and violent crimes in the city and surrounding areas. The introduction of the initial cameras to cover Chichester’s City Centre proved an overwhelming success. This success, coupled with central government funding, resulted in expansion soon after. Cameras were added in surrounding areas.The introduction of the Crime and Disorder Act placed a direct responsibility on local authorities to combat crime and anti-social behaviour through Section 17, which states: *"Without prejudice to any other obligation imposed on it, it shall be the duty of each authority to which this section applies to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent, crime and disorder in its area".* Section 17 was intended to provide the impetus for authorities to consider how their services could contribute to reducing crime and disorder, as well as their impact on social and community factors that affect crime levels. To deliver against these requirements, further government funding was made available and most authorities chose to expand their CCTV services.  |

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| What are the benefits to be gained from using CCTV  | CCTV is a proven tool in detecting crimes, and the perpetrators of it. Using CCTV can significantly reduce the time and cost on the police service in investigating allegations. It is also known that false allegations are made and CCTV is a useful tool in disproving some allegations. CCTV captures actual events and is not influenced by interpretation, or events, as seen by people who are under the influence of alcohol or drugs  |
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| Can CCTV realistically deliver these benefits?  |

 | Yes, and consistently do  |
| Can less privacy-intrusive solutions, such as improved lighting, achieve the same objectives?  | There is a general agreement and belief that other solutions could help. This is certainly the case for smaller confined areas where lighting or fencing could be a more productive solution than CCTV. However, for city centre areas CCTV is still the best solution. CDC do inform members of the public that CCTV is in use by installing signs detailing the scheme and its purpose, along with a contact telephone number.  |
| Do you need images of identifiable individuals, or could the scheme use other images not capable of identifying the individual?  | It is of paramount importance that the system is capable of identifying individuals. Footage from the system will be used in court. If the persons were not identifiable then the system would not be fit for purpose.  |
| Will the particular equipment/system of work being considered deliver the desired benefits now and remain suitable in the future?  | Chichester District Council’s method of work is unlikely to change. The service will remain a manned one for the foreseeable future and will be provided by dedicated and trained, SIA licenced CCTV operators. CDC are always looking at new technologies and how these will help us to deliver a service in the most productive and cost-effective manner. Being up to date on new technology and legislation is very important to us.  |

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| What future demands may arise for wider use of images and how will you address these?  |

 | Legislation can and does change. We will therefore comply with all future regulations placed upon us. As populations increase, it is realistic to assume that pressures will be put on the department to supply images to wider audiences. These include blue light services solicitors, insurance companies and law enforcement agencies such as HRMC, and the Environment Agency.   |
| What are the views of those under surveillance?  | The general feeling is that people who are not involved in crime are happy to be in an area that is monitored by CCTV cameras. There are some members of society both law abiding and those who are not, who have issues with being in areas covered by CCTV cameras. By abiding with current legislation, we aim to show that the CCTV system is only used for crime reduction/detection purposes and those activities that assist the public either by locating vehicles or missing persons. |
| **HRA**  |
| What could we do to minimise intrusion for those that may be monitored, particularly if specific concerns have been expressed? Is the system established on a proper legal basis and operated in accordance with the law?  | Most cameras have installed into them electronic privacy zones that can be used when there is a need. CDC can also install privacy zones when members of the public have legitimate concerns over their privacy in their home. The system has been established on a proper and legal basis and we comply with the DPA and HRA. There is a new protection of freedoms act in force as of 1st May 2012. Chichester District Council will comply with this new legislation.  |

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| Is it necessary to address a pressing need, such as public safety, crime prevention or national security?  | Yes. Most town centres suffer high instances of crime and ASB and we are no different. When the system was installed in 1996, CDC had high rates of crime and the CCTV system was installed to combat the rise in crime, working in partnership with the police. Since the scheme was a huge success the system has grown to help combat crime in other areas.  |
| Is it justified in the circumstances?  | Yes |
| Is it proportionate to the problem that it is designed to deal with?  | Yes. CCTV is used to detect crime and complies with the current legislation.  |

**1. INTRODUCTION**

1.1 This Privacy Impact Assessment (PIA) CCTV is recommended in The

Surveillance Camera Code of Practice, issued by the Surveillance Camera

Commissioner in June 2013 in accordance with Section 30 (1) (a) of The

Protection of Freedom Act 2012. The purpose of the PIA is to ensure that

privacy risks are minimised while allowing the aims of the project to be met

whenever possible.

1.2 Guidance is based on the ICO’s Privacy Impact Assessment Handbook.

The four areas which are highlighted by ICO as potential areas for loss of

privacy in relation to personal data are;

the privacy of personal information;

the privacy of the person;

the privacy of personal behaviour;

the privacy of personal communications

1.3 ‘Personal data’ as defined by Section 1 of the Data Protection Act means data

which relates to a living individual who can be identified:

(a) from those data, or

(b) from those data and other information which is in the possession of,

or is likely to come into the possession of, the data controller, and

includes any expression of opinion about the individual and any

indication of the intentions of the data controller or any other person in

respect of the individual.

1.4 When considering the installation of a camera an Operational Requirement

(OR) must be produced. The OR must be referred to as part of the installation

and camera review process to ensure it meets and continues to be effective in

addressing the purpose for which it was installed.

**2. RESPONSIBLE PERSON CONTACT DETAILS**

Below are the contact details of the person most qualified to respond to

questions regarding this Privacy Impact Assessment.:

Name: Nicholas Bennett

Title: Data Protection Officer

Organisation: Chichester District Council

Email: nbennett@chichester.gov.uk

Telephone: 01243 785166

3. DATA STORAGE & CONTROL

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| 1 | Why a Privacy Impact Assessment is Required |

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| 1.1 | What is the aim of the surveillance system? | The use of the system shall be for the purposeof:-a) Providing Chichester City Centre and Sussex Constabulary with evidence to take criminaland civil action in the Courts;b) Reducing the fear of crime and providingreassurance to the public;c) Providing assistance in the detection andprevention of crime (including counteringterrorism);d) Assisting with the maintenance of public order;e) Deterring or reducing the incidence ofvandalism, graffiti, and other environmentalcrime;f) Deterring persons from committing crimes andto enhance the opportunities for detecting thosewho do;g) Improving the safety and security of residents,visitors and the business community;h) Discouraging anti-social behaviour includingalcohol and drug-related elements;i) Assisting in all aspects of Town CentreManagement.j) To assist in monitoring any Civil ContingenciesOperationsThe cameras are used as a proportionateresponse for crime, disorder and widercommunity safety purposes. The introduction ofthe Crime and Disorder Act 1998 placed a directresponsibility on local authorities to combat crimeand anti-social behaviour through section 17.Section 17 was intended to provide the impetusfor authorities to consider how their servicescould contribute to reducing crime and disorder,as well as their impact on social and communityfactors that affect crime levels. To deliveragainst these requirements, further Governmentfunding was made available and most authoritieschose to expand their CCTV systems |
| 1.2 | What organisations will haveaccess to CCTV images? Whowill take legal responsibilityunder the Data Protection Act? | Chichester District Council and Sussex Constabulary are the main users of the CCTV system,However, other Police Forces and lawenforcement agencies such as The NationalCrime Agency along with ChichesterFire and Rescue Service will be granted accessto the system if a legitimate request is received.Chichester District Council will be the Data Controller at the point of images being recorded, however if anyimages are released to any of the authorisedorganisations, then the legal responsibility will betransferred to that organisation in relation to theimages that have been released. |
| 1.3 | What are the benefits to begained from the system andwho will benefit? | From improved public safety, and reductions incrime. CCTV is a proven tool in detecting crimes, andthe perpetrators of it. Using CCTV cansignificantly reduce the time and cost on thePolice service in investigating allegations.It is known that false allegations are made andCCTV is also useful in disproving someallegations. CCTV captures actual events and isnot influenced by interpretation, or events, asseen by people who are under the influence ofalcohol or drugs. |

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| 2 | Information Flow |
| 2.1 | How is information collected? | The system provides on street video pictures,which are transmitted from cameras positioned invarious locations throughout the borough’s. Thetransmissions are received in the CCTV ControlRoom at Chichester. Some cameras are fixed on a particular scene; others are equipped with pan,tilt and zoom facilities allowing free movementthrough 360 degrees. |
| 2.2 | Where are the real time images from the camera displayed? | Any real-time images that are displayed in thesecure control room environment are presentedon the video wall. There are monitors located ateach operator work station enabling them tomonitor incidents. |
| 2.3 | Who has operational accessand ability to move the CCTVcamera? | Only trained and vetted staff who are employedto work within in the Chichester District Councils CCTV control room, have full operational access including moving of cameras.Sussex Police Control have the ability torequest live video streams, and are able to take control of cameras should a live incident be taking place. |
| 2.4 | How are the images recorded? | Each camera signal is continuously recorded byway of a Digital Video Recorder |
| 2.5 | Where are the recordedimages stored? | On the Hard Drives of Digital Video Recorders,which are housed within a secure remotecommunication room at each control centrelocation |
| 2.6 | How is information stored? | A digital recording and data management systemis in place which covers all data collected by theChichester District Councils CCTV surveillance system |
| 2.7 | What measures are in place tocontrol access to the area inwhich the recorded images arestored? | Access to the Control Room is restricted by anaccess control system. Access at the remote sitesis again restricted by an access control system toeach room. |
| 2.8 | How is information used | Information is used to monitor public safety, andprevent and detect crimes.Evidence is provided for investigation andenforcement.Individuals can requests copies of CCTV datawhich contains their personal information.Disclosure of data is covered by internalprocesses which are fully compliant with relevantlegislation and codes of practice |
| 2.9 | How is access gained to therecorded images? | Data management control levels established onsystem. Hard copy requests for images required. |
| 2.10 | How long are the imagesretained? | 28 days, unless requested as part of an incidentand then stored on archive for 2 months |
| 2.11 | How is information deleted | The data management system automaticallydeletes information after 28 days. |
| 2.12 | When data is downloaded orcopied for release to a thirdparty, how is informationrecorded? | CD ROM, DVD or portable hard drive |
| 2.13 | What processes are in place toensure that data protectionresponsibilities are understoodby persons receiving the data? | Each request for data must be requested in person. In the case of the Police this is authorised by a person at the rank of Sergeant or above. No data is released without signatures. |
| 2.14 | What precautions are in placeto ensure that data willcontinue to be collected e.g. inthe event of a failure of powerto cameras and DVR (?) | UPS system in operation. |
| 3. | DATA PROTECTION ACT |
| 3.1 | Can less privacy intrusivesolutions achieve the sameobjectives? | There is a general consensus that othersolutions could be effective, such as erectingsecurity fencing or improved lighting. However,for our town centre areas CCTV is the bestpossible solution and works hand in hand withimproved street lighting.We do inform members of the public that CCTVis in use by installing signs detailing the schemeand its purpose, along with a contact telephonenumber. |
| 3.2 | Are images of identifiableindividuals required or couldthe scheme use othertechnology not cable ofidentifying individuals? | The system must be capable of identifyingindividuals, as footage from the system will beused in both criminal and civil court cases.If the system did not have this capability it wouldnot be fit for purpose. |
| 3.3 | Will the particularequipment/system of workbeing considered deliver thedesired benefits now andremain suitable in the future? | Yes. Chichester District Council’s working methods areunlikely to change. The service will remain a manned service for theforeseeable future and will be delivered bydedicated, trained, vetted and SIA licensed staffwho are employed directly by Enigma CCTV LTDWe are constantly looking at new technologiesand how these will help us to improve on servicedelivery. |
| 3.4 | What future demands mayarise for wider use of imagesand how will you addressthese? | Legislation can and does change. We will complywith all future regulations placed upon us. Aspopulations increase, it is realistic to assume thatpressure will be put on the department to supplyimages to wider audiences. These includeemergency services, solicitors, insurancecompanies and law enforcement agencies suchas HMRC, DWP and the National Crime Agency. |
| 4. | SURVEILLANCE CODE OF PRACTICE |
| 4.1 | Do you regularly review thesystem against its objectives? | Yes. This is done to comply with our obligations. |
| 4.2 | Is the system being used forany other purpose other thanthose specified? | No |
| 4.3 | Does signage exist highlightingthe use of surveillancecameras? | Yes |
| 4.4 | Does the signage highlight thepoint of contact? | Yes |
| 4.5 | Are all staff aware of theirresponsibilities? | Yes |
| 4.6 | Can a member of the publicrequest footage? | Yes. The procedure of Data Subject Accesscan be requested by contacting the CCTV manager. It is also available in hard copy shouldthey be requested. CCTV footage can only besupplied for up to 28 days from the date and timeof an incident, after which time the images areautomatically overwritten. |
| 5. | RISKS |
| 5.1 | Is the data shared with otherorganisations | Yes for investigation and enforcement |
| 5.2 | Is the system operated in fullcompliance with(i) DPA requirements(ii) ICO codes ofpractice(iii) SCC codes ofpractice(iv) Human Rights Act | Yes |
| 5.3 | Do you have procedures inplace to manage risksassociated with the use ofCCTV cameras | Yes |
| 6. | PRIVACY SOLUTIONS |
| 6.1 | Have you identified solutions to address any risks identified | The system is operated in line with relevant legislation and codes of practice. In addition, allstaff operating/ using the system are fully trainedand audited against compliance and SOP’s (standard operating procedures) and an independent auditor |

Camera Locations & Signage.

Chichester

All operators are aware of their responsibilities and are under licence; they do not and will not use the cameras in an intrusive manner.

Fibre Data

Camera Encoded Fibre Data Decoded Data Port

CCTV Image

 Fibre Data

Decoder

Expander

Encoder

 Data Converter Control

Keyboard

Protocol Converter

FIBRE DATA

•CCTV IMAGE TO THE ENCODED BT EXCHANGE

•DATA SENT THROUGH FIBRE CABLE

•DATA DECODED IN THE BT EXCHANGE

•DATA TO THE EXPANDER

•EXPANDER TO THE PROTOCOL CONVERTER, CONVERTING THE DATA TO IMAGES

•KEYBOARD TO CONVERTER CALLING UP IMAGES

RADIO DATA

Camera Encoder Aerial Data Aerial Decoder Data Port

Expander

Non-Fibre System

Signal

Signal

Non-Fibre System

CCTV Image

Keyboard

Protocol Converter

 Data Converter Control

RADIO DATA

•CAMERA IMAGE TO ENCODER

•ENCODED DATA TO AERIAL

•AERIAL TO AERIAL DATA TRANSFER

•ENCODED DATA TO THE DECODER

•DECODED DATA TO THE EXPANDER

• EXPANDER TO THE PROTOCOL CONVERTER, CONVERTINIG THE DATA TO IMAGE

•KEYBOARD TO CONVERTER CALLING IMAGES

Radio Video

Camera Encoder Aerial Data Aerial Decoder VDA DVR

Digital Video Recorder

Video Distribution Amplifier

Non-Fibre System

Signal

Signal

Non-Fibre System

CCTV Image

Screen

Keyboard

Matrix

 Monitor

RADIO VIDEO

•CCTV CAMERA SENDS DATA TO ENCODER

•ENCODER SENDS INFORMATION TO THE AERIAL

•AERIAL TO AERIAL DATA TRANSFERE

•DATA THROUGH DECODER

•DATA TO THE VDA AND ALSO THE DVR

•FROM THE VDA DATA IS SENT TO THE MATRIX

•KEYBOARD SENDS COMMAND TO MATRIX

•MATRIX GIVES COMMAND TO MONITOR

•IMAGE ON MONITOR THAT WAS COMMANDED FROM KEYBOARD

Data Traffic Flow Chart

 Camera Encoder Fibre Decoded

DVR

VDA

Data

CCTV Image

Data

 Co-Ax Co-Ax Co-Ax

Keyboard

Monitor

Matrix

 Co-Ax

 Co-Ax Data

•CCTV camera sees the images and transmits the data through a series of secure networks.

•The image is sent through a co-ax cable

•The encoded images are transmitted into a BT exchange

•The encoded data is then transmitted through a fibre cable to another BT exchange

•The decoded data is then transmitted by co-ax cable to the VDA (Video Distribution Amplifier)

•The data is sent in two directions from the VDA

•It is sent to the DVR (Digital Video Recorder) for recording onto the system

•It is also sent to the Matrix

•The keyboard sends a command to the matrix, which tells the monitor what image is required.

Assessment carried out by

Name: Sonya Webley

Company: Enigma CCTV LTD

Date: February 2018