

Data Protection Full Assessment - Draft Impact Assessment Id: #16

1.0 Screening Information

Project Name

ANPR camera for Lowesmoor Bus Lane Enforcement

Name of Project Sponsor

Sarah Gilmour

Name of Project Manager

Sarah Gilmour

Name of Project Lead

Jackie Dignam, Imperial

Please give a brief description of the project

Imperial has been employed as a Contractor to WCC to provide ANPR camera technology and full back office system for the civil enforcement of the two bus lanes at Lowesmoor in Worcester

Data Protection screening result

Will require a full impact assessment

Equality and Public Health screening result

Does not need a full impact assessment

Environmental Sustainability screening result

Will require a full impact assessment

1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document. Please see attached file.

Bus Lane enforcement of two bus lanes at Lowesmoor Worcester

Upload Business Case or Support documents

[190329-7944QBN Bus lane enforcement Worcestershire \(002\).docx](#)

Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

Contractor to install 2 ANPR cameras covering bus lane enforcement of 2 bus lanes in Lowesmoor Worcester on behalf of WCC, equipment compliance as 'Approved Device' applied for by WCC to VCA

Contractor to provide end to end business processing of Penalty Charge Notices on behalf of WCC subject to WCC approval
WCC to manage the financial transactions, TRO's and any appeals

Project Outcomes

Briefly summarise what the project will achieve.

Compliance of the traffic regulation order for restricting the bus lanes to buses and bicycles only to give buses priority over other traffic and reduce the impact of congestion and delay on the bus services

Is the project a new function/service or does it relate to an existing Council function/service?

New

Was consultation carried out on this project?

No

Responsibility

Directorate/Organisation

Economy & Infrastructure

Service Area

Strategic Infrastructure & Economy

Specifics

Project Reference (if known)

Not Recorded

Intended Project Close Date *

July 2021

Project Part of a Strategic Programme

Is this project part of a strategic programme?

Yes

An overarching screening has already been carried out for the following areas:

Not recorded

Upload previous impact assessment documents if available

No files uploaded

Personal Data

Who are you processing data about?

People captured by CCTV cameras

What personal data will be collected? *

The second stage is to list all of the types of personal data that you believe the project/works/additional processing will utilise.

Please select yes for as many examples of types of data that are relevant and include any others in the free text at the bottom of the page.

Basic Identifiers:

Name

Yes

Date of Birth

No

Age

No

Gender

No

Sex

No

Contact Details:

Address

Address

Yes

Email Address

No

Home Phone Number

No

Mobile Phone Number

No

Postcode

Yes

ID Number:

National Insurance Number

No

Driving Licence/Number

No

NHS Number

No

Other General Identifier

No

Employment:

Work Related Training/Awards

No

Financial:

Income/Financial/Tax Situation

No

Appearance:

Photograph

Yes

Physical Description

No

Lifestyle:

Living Habits

No

Marital Status

No

Technology:

Login/Username

No

Device MAC Address (Wireless Network Interface)

No

Device Mobile Phone/Device IMEI No

No

Location Data (Travel/GDPS/GSM Data)

No

Online Identifier e.g. IP Address

No

Website Cookies

No

Other Data Types Collected

Not Recorded

 **Legal basis for Personal Data**

What is your lawful basis for processing the personal data? *

Please choose one of the following

Data Subject's consent for the purpose

No

Necessary for a contract with the Data Subject

No

Necessary to comply with a legal obligation

Yes

Necessary to protect the vital interests of an individual(s)

No

Necessary for a task in the public interest or exercise of official authority of Controller

Yes

Necessary for legitimate interests of Controller unless interests are overridden by the interests or rights of the individual (only available in limited circumstances to public bodies)

Yes

DRAFT

Special Data

What special category personal data (if any) will be collected? *

This section will not apply to all projects and should only be completed if it applies to you.

It is important that you read this section carefully, as these data types require additional care and protection.

If you do pick anything from this list, you will be required to give more details in Section 4 of this form.

You can read more about Special Category Data through this link;

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/lawful-basis-for-processing/special-category-data/>

Race

No

Ethnic origin

No

Political opinions

No

Religion

No

Philosophical beliefs

No

Trade union membership

No

Genetic Data

No

Biometric Data

No

Sex life

No

Health or social care

No

Legal basis for Special Data

What is the relevant condition for processing the special category personal data? *

You must qualify under one of the below exemptions as well as having a legal basis from the previous question.

Explicit Consent

The data subject has given explicit consent to the processing of those personal data for one or more specified purposes, except where Union or Member State law provide that the prohibition referred to in paragraph 1 may not be lifted by the data subject;

Not Recorded

Employment and Social Security

Processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law or a collective agreement pursuant to Member State law providing for appropriate safeguards for the fundamental rights and the interests of the data subject;

Not Recorded

Vital Interests

Processing is necessary to protect the vital interests of the data subject or of another natural person where the data subject is physically or legally incapable of giving consent;

Not Recorded

Legitimate Interests of:

"a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim".

Processing is carried out in the course of its legitimate activities with appropriate safeguards by a foundation, association or any other not-for-profit body with a political, philosophical, religious or trade union aim and on condition that the processing relates solely to the members or to former members of the body or to persons who have regular contact with it in connection with its purposes and that the personal data are not disclosed outside that body without the consent of the data subjects;

Note – this is not often applicable to local authorities.

Not Recorded

Publicly Available Data

Processing relates to personal data which are manifestly made public by the data subject;

Not Recorded

Legal or Court Proceedings

Processing is necessary for the establishment, exercise or defence of legal claims or whenever courts are acting in their judicial capacity;

Not Recorded

Public Interest - Statutory Necessity

Processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject;

Not Recorded

Medical, Health and Social Care Provision

Processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee, medical diagnosis, the provision of health or social care or treatment or the management of health or social care systems and services on the basis of Union or Member State law or pursuant to contract with a health professional and subject to the conditions and safeguards referred to in paragraph 3;

Not Recorded

Public Health

Processing is necessary for reasons of public interest in the area of public health, such as protecting against serious cross-border threats to health or ensuring high standards of quality and safety of health care and of medicinal products or medical devices, on the basis of Union or Member State law which provides for suitable and specific measures to safeguard the rights and freedoms of the data subject, in particular professional secrecy;

Not Recorded

Archiving or Scientific, Historical or Statistical Research Purposes

Processing is necessary for archiving purposes in the public interest, scientific or historical research purposes or statistical purposes in accordance with Article 89(1) based on Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

Not Recorded

2.4

Information Involved

Understanding the information flows involved in a project is essential to a proper assessment of privacy risks.

How will the data be collected? *

This section should be filled in for every project, not just those collecting Special Category data.

Automatic Number Plate Recognition Cameras.

Videalert Rapidly Deployable Server (RDS) Enforcement system for fixed cameras, (used under the manufacturers Certification) approved by Vehicle Certification Agency as suitable for the operation of Bus Lane Enforcement in the Worcestershire County Council area. The recorded vehicle owners details is then requested through the DVLA and a notice sent to the owner/keeper of the vehicle.

What will the data be used for? *

This section should be filled in for every project, not just those collecting Special Category data.

Identifying unlawful vehicle usage of 2 bus lanes in Worcester and issuing penalty charge notices to owners of vehicles in contravention of the traffic regulation order protecting the bus lanes

Has data already been collected?

No

Are the purposes for which you are collecting the data different? *

If the data you are hoping to use was not collected specifically for this project, please explain in the box below why it was collected. This will include data that you have collected from other teams within WCC.

Not Recorded

Explain why existing and/or less intrusive processes or measures would be inadequate *

In this section, you should explain why your new method/project is absolutely necessary and show that you have thought about all other options.

ANPR cameras are the most unintrusive and efficient manner of moving vehicle contraventions such as civil enforcement of bus lanes. This methodology is supported by legislation

3.0 Other organisations**Are other organisations involved in processing the data?**

Yes

Please provide details of each organisation that is involved in the processing of Data. Do this by adding to the below list. *

Organisation Name	imperial
Data Controller or Data Processor	Data Processor
Organisation's Role	Leasing of ANPR camera equipment Provision of processing for penalty charge notices for vehicles in contravention of traffic regulation orders
Data Sharing Agreement or Contract	Yes
Contract Reference Number/DSA Name	ICES/WCC/2019/1
Organisation involved reason Disclosure and Security	Contracted to provide equipment and systems required for camera enforcement of bus lanes Yes

1 record

3.1 Storage detail**How will the information be stored? ***

Please include details of whether data will be stored outside of the European Economic Area (EEA).

Please remember that cloud storage and back up servers maybe outside the EEA.

All data is stored within the UK within the back office database, 3Sixty, which meets all relevant legislative requirements for civil parking and traffic regulation enforcement including those captured by CCTV.

For how long will the data be retained? *

Data will be retained for two years after the notice has been resolved for any photographic or video data, incoming and outgoing correspondence, scanned documents and personal address details. The remaining case data will be retained for seven years after the notice has been resolved. The two year and seven year retention periods can be amended if required

What is the deletion process? *

The deletion (purge) process runs daily as a scheduled task on the database overnight.

4 Consultation details

Consultation can be used at any stage of the DPIA process and is important to allow people to highlight privacy risks and solutions based on their own area of interest or expertise.

For further assistance and information please visit the [consultation toolkit section on Ourspace](#).

Explain what practical steps you are going to take to ensure that you identify and address privacy risks *

Received manufacturers declaration of an 'approved device' for the purpose of Civil Traffic Enforcement and sent to Vehicle Certification Agency

Payment Card Security assessment

Who should be consulted, internally and externally? Do you need to seek the views of members of the public? *

The public will be made fully aware of the camera enforcement. There will be road signs indicating camera enforcement is in place and it will be publicized in local papers for two weeks prior to cameras being activated and for 2 weeks following activation there will be letters sent to vehicle owners contravening the bus lane rather than penalty notices

How will you carry out the consultation? *

(You should link this to the relevant stages of your project management process)

The enforcement of the bus lane will be publicized in local papers for two weeks prior to cameras being activated and for 2 weeks following activation there will be letters sent to vehicle owners contravening the bus lane rather than penalty notices.

5 Risk register

At this stage you should identify the possible privacy risks together with their likelihood, severity and overall level, and for high risks the measures taken to reduce the risk.

Add any risk to the relevant sections below.

Fair and Lawful Processing

Data must be processed lawfully, fairly and in a transparent manner.

Please also consider

- Have you identified at least one lawful basis for the personal data processed as part of the project?
- Does at least one Controller involved have a lawful power to act?
- Do you need to create or amend a privacy notice?
- How is your processing going to be transparent?

Risk that processing is not transparent, and individuals are unaware that data is being collected or why it is processed

Unmitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Mitigation/Solution

Bus lane signage updated to incorporate camera enforcement information. Publicity prior to start of enforcement. Warning letters will be sent out for 1st 2 weeks prior to issuing of PCN's

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Reduced

Risk that information is being processed unlawfully

Unmitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Mitigation/Solution

Imperial have many years experience in providing systems and processing for bus lane schemes. The lawful basis for processing data in relation to bus lane schemes is well established

Mitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Result

Reduced

Specific, explicit and legitimate purposes

The purpose for which you process personal data must be specified, explicit and legitimate. Personal data collected must not be processed in a manner that is incompatible with the purpose for which it was originally collected.

Please also consider

- Does your project plan cover all of the purposes for processing personal data? If not your plan needs amending accordingly.
- Are all elements of the processing compatible with the original reason and justification for the processing?
- What are these specific, explicit and legitimate purposes?

Risk of 'mission creep' and information is used for different, or incompatible purposes to that identified when originally collected**Unmitigated Risk**

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Mitigation/Solution

Meet government legislation and guidance on bus lane enforcement. Equipment has been approved by DfT and VCA. Worcs County Council is a bus lane enforcement agency for Worcester City district area

Mitigated Risk

Likelihood - Unlikely

Severity - Minimal Impact

Score - Low

Result

Reduced

Adequate, relevant and not excessive

Personal data processed must be adequate, relevant and not excessive in relation to the purpose for which it is processed.

Please also consider

- Is the quality of the information adequate for the purposes it is used?
- If not, how is this to be addressed?
- Are measures in place to ensure that data is limited to that which is needed to fulfill the aim of the processing?
- Which personal data elements do not need to be included without compromising the needs of the project?

Risk of loss of control over the use of personal data**Unmitigated Risk**

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Mitigation/Solution

All personal data is held in the back office database which is only accessible by users with the relevant training and system privileges within the back office system

Mitigated Risk

Likelihood - Unlikely

Severity - Some Impact

Score - Low

Result

Reduced

Risk that inadequate data quality means the information is not fit for the identified purpose(s) potentially leading to inaccurate decision making

Unmitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Mitigation/Solution

Approved device compliance for bus lane enforcement, detailed documentation of decision making and appeals process

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result

Reduced

Risk that any new surveillance methods may be an unjustified intrusion on individuals' privacy**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Mitigation/Solution

The surveillance equipment is only used to identify vehicles in contravention of a traffic regulation order - no other purpose

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result

Reduced

Accurate and timely

Personal data processed must be accurate and, where necessary, kept up to date, and every reasonable step must be taken to ensure that personal data that is inaccurate is erased or rectified without delay.

Please also consider

- If you are procuring new software does it allow you to amend data when necessary?
- How are you ensuring that personal data obtained from individuals or other organisations is accurate?
- Do you have processes in place to keep data up to date?
- If any data sets are to be merged, what checks are carried out to ensure that the right data records are matched/merged together?

Any data matching or linking, including whole data sets may link wrong records together**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Mitigation/Solution

Appeals process included

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result

Reduced

Storage limitation

Personal data must be kept for no longer than is necessary for the purpose for which it is processed. Appropriate time limits must be established for the periodic review of the need for the continued storage of personal data.

Please also consider

- What are the risks associated with how long data is retained and how they might be mitigated?
- Has a review, retention and disposal (RRD) policy been established?
- How does the software enable you to easily act on retention criteria – does it enable bulk review/destruction; set review periods; extract for long-term preservation/retention of the corporate memory?

Risk information is retained for the wrong length of time (both too long and too short)**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Mitigation/Solution

Contractor is experienced in the processing of ANPR bus lane contravention data. The data retention periods are configured within the system and a daily scheduled task removes data from the system automatically once the data retention periods have elapsed

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result

Reduced

Risk information is not securely destroyed when its retention period has been reached**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

WCC to ensure data is destroyed after retention period. The daily scheduled task that will remove data after the retention period has passed produces an audit trail within the system showing that the process has run and the number of cases that have had data removed.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Security

Personal data must be processed in a manner that ensures appropriate security of the personal data, using appropriate technical or organisational measures (and, in this principle, "appropriate security" includes protection against unauthorised or unlawful processing and against accidental loss, destruction or damage).

Please also consider

- What technical and organisational measures are in place to ensure that the data is protected to an adequate level?
- What training on data protection and/or information sharing has been undertaken by relevant staff?
- What access controls are in place to enforce the 'need to know' principle?
- What assurance frameworks are utilised to assess adequacy of security measures in place e.g. NHS DSPT; Cyber Essentials Plus; PSN Certification?

Risk of loss of confidentiality**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

Data is securely held within the back-office database. This is only accessible to appropriately trained staff with the necessary access privileges.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk of inadequate security controls in place to protect and secure personal data, including inappropriate access**Unmitigated Risk**

Keep it Green, Keep it on the Screen

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

Data is securely held within the back-office database. Users are granted access privileges on the principle of least privileges, ensuring that users are not given access beyond what is necessary to be able to perform their role.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk that workers processing the data are not aware of their data responsibilities

Unmitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

All users processing data will have undergone a training program that includes courses covering data protection generally and specifically GDPR.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk that information is distributed using inappropriate methods

Unmitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

The back-office system only allows users to distribute information using the pre defined methods and processes within the software. Users are also trained in data protection and know that if information that includes personal data is being distributed this must be done using a secure method.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk of re-identification of pseudonymized or anonymised data (e.g. collecting matching and linking identifiers and information may result in information that is no longer safely anonymised)

Unmitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

Any data that is anonymized will have all relevant identifiers removed or anonymized so that they cannot be used to link data successfully..

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk that information is transferred to a 'third country' without adequate safeguards

Keep it Green, Keep it on the Screen

Unmitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

All data within the back-office system is held within the UK. There is no operational requirement to move any of the information to a 'third country'. Users are trained in data protection and will be aware that moving data to a 'third country' without adequate safeguards is not permitted.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Financial and reputational**Risk of identity theft or fraud****Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

The process involved does not normally require any documents that could be used as proof of identity to be provided by members of the public. Back office staff are also trained in data protection and are aware of the risks of identity theft and fraud.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk of financial loss for individuals or other third parties**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

All financial transactions are reconciled on a daily basis to ensure that the transactions entered within the back-office system are a true and accurate representation of any banking transactions.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk of financial loss for the Council (including ICO fines)**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

All staff receive data protection training to ensure they are fully aware of the nature and the consequences of data breaches that are reported to the ICO. Quality checks are made on outgoing correspondence and telephone conversations to ensure that no data protection legislation is breached

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Risk of reputational damage to the Council, partners, and processors**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

The Council's supplied policies will be followed within the notice processing operation. All wording for standard letter templates and paragraphs will be agreed between Imperial and the Council.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Result

Reduced

Health, safety and wellbeing**Risk of physical harm to individuals**

No Risk

Risk of physical harm to staff and workers

No Risk

Risk of discrimination

No Risk

Risk of other significant economic or social disadvantage

No Risk

Individuals Rights

Data protection legislation gives data subjects' various rights (listed below). Limiting or restricting any of these rights is likely to be a significant impact so the justification for any restriction, as well as mitigations, must be fully outlined.

Inability to meet individuals' right to be informed

No Risk

Inability to meet individuals' right of access**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

Cancellation policy sets out all legal rights of access

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result

Reduced

Inability to meet individuals' right to rectify inaccurate data**Unmitigated Risk**

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

Appeals process in place

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result
 Reduced

Inability to meet individuals' right to erase data

Unmitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

The back office system has functionality to allow for the deletion of an individual's data upon request and in line with the applicable legislation

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result
 Reduced

Inability to meet individuals' right to restrict processing

Unmitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

Any data that is required to be restricted can be moved to a state within the system to prevent further processing

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result
 Reduced

Inability to meet individuals' right to object

Unmitigated Risk

Likelihood - Unlikely
 Severity - Some Impact
 Score - Low

Mitigation/Solution

Appeals process implemented

Mitigated Risk

Likelihood - Unlikely
 Severity - Minimal Impact
 Score - Low

Result
 Reduced

Inability to meet individuals' rights relating to automated decision making and profiling

Unmitigated Risk

Likelihood - Reasonably Unlikely
 Severity - Some Impact
 Score - Medium

Mitigation/Solution

Cancellation policy and appeals process means that each case is dealt with on it's own individual merits and is no decision is made automatically.

Mitigated Risk

Likelihood - Unlikely
 Severity - Some Impact

Score - Low

Result

Reduced

Additional project specific risks

No additional risks recorded

6 Declaration

I confirm to the best of my knowledge that the information I have provided is true, complete and accurate *

Selected

I confirm that I will make sure that data protection has been and continues to be considered throughout the project life cycle and should circumstances change in the project to include any processing of personal data a further Data Protection Impact Assessment Screening will be carried out *

Selected

Environmental Sustainability Full Impact Assessment

Impact Assessment Id: #16

1.0 Screening Information

Project Name

ANPR camera for Lowesmoor Bus Lane Enforcement

Name of Project Sponsor

Sarah Gilmour

Name of Project Manager

Sarah Gilmour

Name of Project Lead

Jackie Dignam, Imperial

Please give a brief description of the project

Imperial has been employed as a Contractor to WCC to provide ANPR camera technology and full back office system for the civil enforcement of the two bus lanes at Lowesmoor in Worcester

Data Protection screening result

Will require a full impact assessment

Equality and Public Health screening result

Does not need a full impact assessment

Environmental Sustainability screening result

Will require a full impact assessment

1.1 Background and Purpose

Background and Purpose of Project?

To support your answer to this question, you can upload a copy of the project's Business Case or similar document. Please see attached file.

Bus Lane enforcement of two bus lanes at Lowesmoor Worcester

Upload Business Case or Support documents

[190329-7944QBN Bus lane enforcement Worcestershire \(002\).docx](#)

Project Outputs

Briefly summarise the activities needed to achieve the project outcomes.

Contractor to install 2 ANPR cameras covering bus lane enforcement of 2 bus lanes in Lowesmoor Worcester on behalf of WCC, equipment compliance as 'Approved Device' applied for by WCC to VCA

Contractor to provide end to end business processing of Penalty Charge Notices on behalf of WCC subject to WCC approval
WCC to manage the financial transactions, TRO's and any appeals

Project Outcomes

Briefly summarise what the project will achieve.

Compliance of the traffic regulation order for restricting the bus lanes to buses and bicycles only to give buses priority over other traffic and reduce the impact of congestion and delay on the bus services

Is the project a new function/service or does it relate to an existing Council function/service?

New

Was consultation carried out on this project?

No

1.2 Responsibility

Directorate/Organisation

Economy & Infrastructure

Service Area

Strategic Infrastructure & Economy

1.3 Specifics

Project Reference (if known)

Not Recorded

Intended Project Close Date *

July 2021

1.4 Project Part of a Strategic Programme

Is this project part of a strategic programme?

Yes

An overarching screening has already been carried out for the following areas:

Not recorded

Upload previous impact assessment documents if available

No files uploaded

2 Greenhouse Gas Emissions

Could the project result in an increase in GHG emissions (including CO2)? No

Please be mindful that the Council has committed to reduce its GHG emissions to zero by 2050 and most projects are likely to have an impact on this target. This should be a key consideration in your project delivery and should be reviewed when completing the assessment.

Have you undertaken an assessment of the project to know if there will likely be an increase in GHG emissions? Yes

3 Resources

Will the project result in increased consumption of electricity, gas or other heating fuels? No

e.g. project may require use of additional buildings, lighting and heating in buildings, additional ICT equipment, etc.

Will the project reduce energy needs and result in reduced consumption? Yes

e.g. disposal of WCC property assets

Will the project require additional water resources leading to an increase in water consumption? No

e.g. increased use of water through construction processes

Might there be a decrease in water consumption? No

e.g. will the project involve water saving measures or initiatives

Will the project result in the use of other resources, materials or minerals? No

e.g. use of natural resources such as wood; or use of aggregate minerals?

4 Transport

Will the project result in more people needing to travel? No

e.g. will there be additional cars on the road

Have alternative transport modes been considered? Yes

e.g. could use be made of public transport/walking/cycling etc.

Please explain your answer below:

This is a bus priority project

5 Waste

Is there likely to be an increase in waste as a result of the project? No

e.g. construction waste, packaging waste etc.

Have opportunities to prevent, minimise, reuse or recycle waste been identified and considered? No

e.g. will recycling facilities be available as part of the project

6 Wildlife and Biodiversity

Will there be any negative impacts on the natural environment? No

e.g. will the project involve removal of green space/trees; have wildlife surveys been considered; result in enhancements to green infrastructure; increased biodiversity opportunities etc.?

Has a preliminary ecological appraisal been undertaken? Not answered

Has there been consideration of statutory assessments? Yes

e.g. Sustainability Appraisals, Sustainable Environmental Appraisals and Habitat Regulations Assessment Screening?

N.B. This is a matter of legal compliance - All plans and projects (including planning applications) which are not directly connected with, or necessary for, the conservation management of a habitat site, require consideration of whether the plan or project is likely to have significant effects on that site. This consideration – typically referred to as the 'Habitats Regulations Assessment screening' – should take into account the potential effects both of the plan/project itself and in combination with other plans or projects.

Please explain your answer below:

There is no change to the environment or habitat as a result of this project it is simply enforcing a traffic regulation order that is already in place

7 Pollution to land/air/water

Is there a risk of pollution to the local environment? No

e.g.

- will there be surface water run-off or discharge into local water source?
- will there be any impact on local water quality?
- will any waste water require treatment?
- is there the potential for spillage of chemicals?
- is there the potential for emissions to air from combustion processes resulting in poor air quality?

8 Resilience to climate risks

Could climate risks affect your project? No

N.B. some projects may be more sensitive to future changes in the climate e.g. hotter and drier summers; milder and wetter winters; increased likelihood of extreme weather events. These climate risks may affect project delivery and should be considered at the early stages of project development.

Has the impact of extreme weather events on the project been considered? No

e.g. heat waves and flooding.

Is there a business/project continuity plan in place to ensure climate risks are minimised? No

e.g. can you ensure that the project is resilient to climate risks and can continue to deliver on outcomes.

Could the project exacerbate climate risks? No

e.g. increase flood risk or worsen temperature extremes in the locality.

Will the project result in the use of other resources, materials or minerals? No

e.g. use of natural resources such as wood; or use of aggregate minerals?

9 Historic Environment

Have you checked with the WCC Historic Environment team as to whether there are any impacts on the Historic Environment (negative or positive)?

No

Check every development with the Historic Environment Team at the planning stage of each project. Further assessment may be required depending on the nature and scale of development. There may also be design options that would negate any need for further assessment (and lessen costs), or even opportunities to enhance heritage assets or their setting through the development.

Does the development have the potential to result in any impacts to the historic environment or opportunities for enhancement?

No

If yes, then further assessment will be required. This could take the form of a watching brief during groundworks if the potential is clearly understood and relatively low, or a more comprehensive desk-based and/or field investigation prior to development.

10 Procurement

Could any procurement associated with the project have a detrimental environmental impact? No

e.g. procurement of goods from overseas that have to be shipped; use of unsustainable materials or materials that cannot be recycled at the end of their use?

Is there likely to be increased Greenhouse Gas emissions from products purchased for the project? No

e.g. carbon emissions from transport and manufacturing

Will you be able to make use of sustainable products? No

e.g. recycled, local, ethical etc.

Have you considered the Public Services (Social Value) Act 2012? No

All major contracts let by the Council (those of more than £100,000 in total value) will be expected to deliver a meaningful contribution to our vision of Social Value in the county. The Act requires us to consider how the services we commission and procure might improve the economic, social and environmental well-being of the local area.

– please see: [Social Value](#)

Declaration

I have confirmed that to the best of my knowledge that the information I have provided is true, complete and accurate

I have confirmed that I will make sure that Environmental Sustainability has been and continues to be considered throughout the project life cycle and should circumstances change in the project a further Environmental Sustainability Assessment Screening will be carried out.