

# EQUALITY IMPACT ASSESSMENT

CCTV Strategy

Reference: EIA000421

Date: 18/04/2024

Submitted by: Hannah Forrest



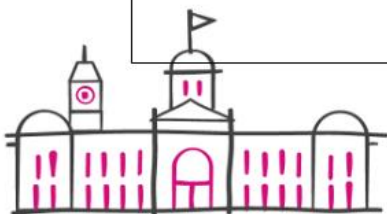
 **RESET**

 **RESHAPE**

 **RESTART**

**EIA Form – About your EIA**

Reference number	EIA000421
Date Submitted	18/04/2024
Subject of the EIA	CCTV Strategy
Brief description of the policy, service or function covered by the EIA	<p>The Regulator of Social Housing is moving from a reactive to a proactive regime of governance, providing a more robust challenge to landlords and the ability to inspect landlords to ensure compliance with the Consumer Standards, some of which specifically focus on the way in which the landlord responds to ASB and hate crime and seeks to resolve it. As a Local Authority and a Social Landlord Birmingham City Council are required to adhere to changes set by the Regulator of Social Housing. In response the Council undertook a self-assessment against the Consumer Standards in November 2023 in preparation for inspection by the regulator. As part of the actions identified from this self-assessment, there were obvious risks around the management of ASB both in terms of policy and procedure. Local authorities are under greater scrutiny regarding the management of high-rise blocks in particular, and the Council has invested significantly to comply with the relevant legislation and ensure that tenants are provided with buildings that are safe. The Council's Asset Management Strategy 2024-2029 was approved by Cabinet in January 2024. One of the key priorities within the strategy was that all Council homes should be 'Safe'. A commitment of this strategy was to explore how CCTV can be re-introduced into Council high and low-rise blocks and neighbourhoods to enable residents to feel safer in their home. The Council's existing CCTV system became non-compliant with relevant legislation (and therefore obsolete) in 2013. Since the decommissioning of the CCTV system in 2014, there has been an increase in crime and ASB within many blocks. The Council received 4384 reports of ASB in 2022-23. The Council's decision to decommission CCTV has driven this increase has limited our ability to identify perpetrators and take appropriate action. The Council interacts with tenants and leaseholders in many ways in relation to housing issues, and a constant theme within these interactions, either formal or informal, is that the majority of tenants feel that the Council should provide CCTV to act as a deterrent to crime, ASB and to support the Council and police in taking action against perpetrators. Given the size of the Council's portfolio of high-rise blocks (204 with 35 being sheltered accommodation), this has presented a significant pressure and to this point no decision has been</p>



	<p>made in relation to the provision of CCTV. As a proportionate response, the City Housing Directorate have chosen to implement CCTV in specific ASB hotspot areas over a 12-month pilot period with implementation in January 2025 to test whether this improves the resident experience and reduces ASB. Evaluating this across a select number of areas of concern means that there will be an evidence base for future wholesale implementation, making an increase in service charge more palatable for tenants and leaseholders. The City Housing Directorate have triangulated significant data sources via Power BI to identify “hot spots” where a particular block or estate is experiencing significant crime and ASB, and where it would therefore be most beneficial to trial the use of CCTV as a deterrent and to provide reassurance to the affected tenants. The Capital works high-rise programme is already underway across the city delivering improvement works over a 12-year period. The infrastructure of CCTV will be installed on every floor of each high-rise block within the programme, allowing cameras to be easily moved across floors or for the number of cameras to be increased. This will target areas of blocks where ASB and criminal damage are a specific issue, with the capability to proactively change the locations depending on need. Allowing the Council to utilise cameras as an effective tool, relocating accordingly. The council will strategically select the best suitable security package through a block-by-block analysis, determining the scope of the installation, number and location of cameras.</p>
Equality Assessment is in support of...	["New strategy"]
How frequently will you review impact and mitigation measures identified in this EIA?	Six months
Due date of the first review	2025-01-30

#### Directorate, Division & Service Area

Which directorate(s) are responsible for this EIA?	["City Housing"]
Division	Strategic Enabling
Service area	Housing Modernisation
Budget Saving	No

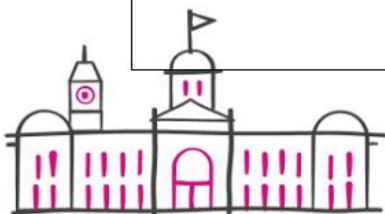
#### Officers



What is the responsible officer's name?	Hannah Forrest
What is the responsible officer's email address?	Hannah.Forrest@birmingham.gov.uk
What is the accountable officer's name?	Guy Chaundy
What is the accountable officer's email address?	guy.chaundy@birmingham.gov.uk

### Data Sources

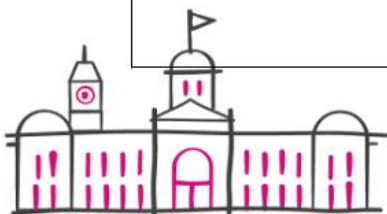
Data sources	["Birmingham City Observatory data and insight", "Quantitative data (please specify in the box below)", "Surveys"]
Data source details	<p>Viewing the Birmingham City Observatory Data and Insight, there is limited data sources on crime and 'Hot Spots' across the 69 wards in Birmingham. Information regarding deprivation across wards does not provide significant information on crime including a breakdown or display a correlation with deprivation. Other data sources have therefore been utilised to project a more accurate picture of 'Hot Spots' for elevated crime and ASB across wards in Birmingham. The council's data source Power Bi has provided the bulk of information for this strategy, as the council underwent a large data cleansing exercise in 2023 to better understand the data from tenants in order to respond to their needs more effectively through council services. Reports across Birmingham wards were obtained from Power Bi for the 12 month pilot scheme so that the council was able to 'dive deeper' into complaints received by tenants relating to a range of activities and strategically identify wards to target during the pilot scheme. This highlighted a variety of activity and statistical figures for; ASB, Fire Damage, Criminal Damage, Assaults and Drug taking inside and surrounding blocks. Providing a rationale for the approach of installation of CCTV in selected blocks and wards. Data was analysed alongside the following; responses from tenants in Tenant Satisfaction Surveys undertaken by 'Housemark' who was commissioned by the council. The results of these surveys highlight tenants' overall dissatisfaction with the council's response to ASB and in the council's ability to provide safe homes. Over the course of the last 12 months, the Council have been undertaking Tenant Perception Surveys as part of the implementation of the Social Housing Regulation Act, implemented by the Regulator of Social Housing. The results of these surveys will be formally submitted to the Regulator in June 2024 and will be published publicly.</p>



	<p>Through the collection of this data, we have identified low levels of satisfaction around ASB and tenants and leaseholders feeling generally unsafe in their home and how their reports are dealt with. This perception is strongly felt in high-rise blocks and local Community Safety Partnership data supports this. Knowledge has also been gathered from neighbourhoods over time as the council interacts with tenants and leaseholders in many ways in relation to housing issues, and safety has become a constant theme in feedback resulting in an increase in the request from tenants for the installation of CCTV in blocks.</p>
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### Protected Characteristics

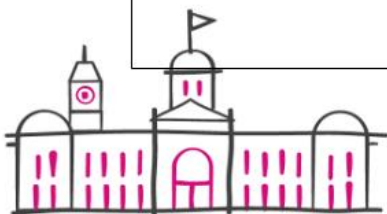
Protected Characteristic – Age	
Does this proposal impact people due to their age as per the Equality Act 2010?	No
What age groups are impacted by your proposal?	
Please describe the impact to the age characteristic	
How could you mitigate against any negative impact to the age characteristic?	
Please describe how this proposal does not impact people due to their age	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against age of tenants or visitors.</p> <p>The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed. In mitigation, the Council will carry out a full Data Protection Impact Assessment (DPIA) for each block during 12-month pilot to assess the likelihood and severity of any impact on individuals.</p> <p>The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers</p>



	Act. The Council will also ensure compliance with any other relevant legislation such as the Surveillance Cameras Code of Practice and the Passport to Compliance.
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**Protected Characteristic – Disability**

Does this proposal impact those people with a disability as per the Equality Act 2010?	No
Please describe the impact to the disability characteristic	
How could you mitigate against any negative impact to the disability characteristic?	
Please describe how this proposal does not impact people due to their disability	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against the disability of tenants or visitors.</p> <p>The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed. The Council carries out an assessment under the Data Protection Impact Act (DPIA) prior to the installation of any new CCTV scheme, having due regard to the nature and scope of the surveillance activities and their potential to interfere with the privacy rights of citizens.</p> <p>DPIA assessments will be embedded into any future activities relating to the installation or expansion of existing CCTV schemes. In mitigation, the Council will carry out a full Data Protection Impact Assessment (DPIA) for each block during the 12-month pilot to assess the likelihood and severity of any impact on individuals.</p> <p>The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers Act. The Council will also ensure compliance with any other</p>



	relevant legislation such as the Surveillance Cameras Code of Practice and the Passport to Compliance.
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Protected Characteristic – Sex	
Does this proposal impact citizens based on their sex as per the Equality Act 2010?	No
What sexes will be impacted by this proposal?	
Please describe the impact to the sex characteristic	
How could you mitigate against any negative impact to the sex characteristic?	
Please describe how this proposal does not impact people due to their sex	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against the sex of tenants or visitors.</p> <p>The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed. The Council carries out an assessment under the Data Protection Impact Act (DPIA) prior to the installation of any new CCTV scheme, having due regard to the nature and scope of the surveillance activities and their potential to interfere with the privacy rights of citizens.</p> <p>DPIA assessments will be embedded into any future activities relating to the installation or expansion of existing CCTV schemes. In mitigation, the Council will carry out a full DPIA for each block during the 12-month pilot to assess the likelihood and severity of any impact on individuals.</p> <p>The Council carries out an assessment under the DPIA prior to the installation of any new CCTV scheme, having due regard to the nature and scope of the surveillance activities and their potential to interfere with the privacy rights of citizens.</p>



**Protected Characteristic - Gender Reassignment**

<p>Does this proposal impact people who are proposing to undergo, undergoing or have undergone a process to reassign one's sex as per the Equality Act 2010?</p>	<p>No</p>
<p>Please describe the impact to the gender reassignment characteristic</p>	
<p>How could you mitigate against any negative impact to the gender reassignment characteristic?</p>	
<p>Please describe how this proposal does not impact people due to gender reassignment</p>	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against the gender reassignment of tenants or visitors. The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed.</p> <p>The Council carries out an assessment under the Data Protection Impact Act (DPIA) prior to the installation of any new CCTV scheme, having due regard to the nature and scope of the surveillance activities and their potential to interfere with the privacy rights of citizens. DPIA assessments will be embedded into any future activities relating to the installation or expansion of existing CCTV schemes. In mitigation, the Council will carry out a full DPIA for each block during the 12-month pilot to assess the likelihood and severity of any impact on individuals.</p> <p>The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers Act</p>

**Protected Characteristic - Marriage and Civil Partnership**





Does this proposal impact people who are married or in a civil partnership as per the Equality Act 2010?	No
What legal marital or registered civil partnership status will be impacted by this proposal?	
Please describe the impact to the marriage and civil partnership characteristic	
How could you mitigate against any negative impact to the marriage and civil partnership characteristic?	
Please describe how this proposal does not impact people who are married or in a civil partnership	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against tenants or visitors that may or may not be married or in a civil partnership. The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers Act.</p> <p>The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed. The Council carries out an assessment under the Data Protection Impact Act (DPIA) prior to the installation of any new CCTV scheme, having due regard to the nature and scope of the surveillance activities and their potential to interfere with the privacy rights of citizens.</p> <p>DPIA assessments will be embedded into any future activities relating to the installation or expansion of existing CCTV schemes. In mitigation, the Council will carry out a full DPIA for each block during the 12-month pilot to assess the likelihood and severity of any impact on individuals.</p>

### Protected Characteristic - Pregnancy and Maternity



<p>Does this proposal impact people covered by the Equality Act 2010 under the protected characteristic of pregnancy and maternity?</p>	<p>No</p>
<p>Please describe the impact to the pregnancy and maternity characteristic</p>	
<p>How could you mitigate against any negative impact to the pregnancy and maternity characteristic?</p>	
<p>Please describe how this proposal does not impact people who are covered by the pregnancy and maternity characteristic</p>	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against tenants or visitors who may be covered by the pregnancy and maternity characteristic.</p> <p>The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers Act. The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed.</p> <p>The Council carries out an assessment under the Data Protection Impact Act (DPIA) prior to the installation of any new CCTV scheme, having due regard to the nature and scope of the surveillance activities and their potential to interfere with the privacy rights of citizens.</p> <p>DPIA assessments will be embedded into any future activities relating to the installation or expansion of existing CCTV schemes. In mitigation, the Council will carry out a full DPIA for each block during the 12-month pilot to assess the likelihood and severity of any impact on individuals.</p>

Protected Characteristic - Ethnicity and Race

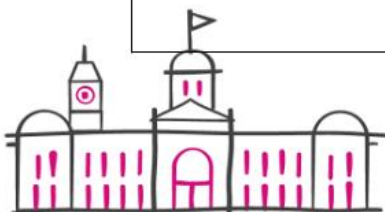


Does this proposal impact people due to their race as per the Equality Act 2010?	No
What ethnic groups would be impacted by this proposal?	
Please describe the impact to the ethnicity and race characteristic	
How could you mitigate against any negative impact to the ethnicity and race characteristic?	
Please describe how this proposal does not impact people due to their race	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against or focus on tenants or visitors due to their race, during the CCTV pilot scheme or the proposed CCTV strategy.</p> <p>The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers Act.</p> <p>The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed. The Council carries out an assessment under the Data Protection Impact Act (DPIA) prior to the installation of any new CCTV scheme, having due regard to the nature and scope of the surveillance activities and their potential to interfere with the privacy rights of citizens.</p> <p>DPIA assessments will be embedded into any future activities relating to the installation or expansion of existing CCTV schemes. In mitigation, the Council will carry out a full DPIA for each block during the 12-month pilot to assess the likelihood and severity of any impact on individuals.</p>



**Protected Characteristic - Religion or Beliefs**

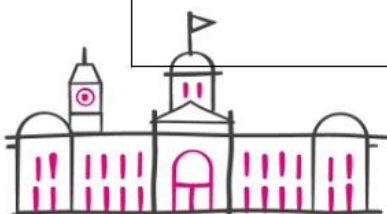
Does this proposal impact people’s religion or beliefs as per the Equality Act 2010?	No
What religions could be impacted by this proposal?	
Please describe the impact to the religion or beliefs characteristic	
How could you mitigate against any negative impact to the religion or beliefs characteristic?	
Please describe how this proposal does not impact people due to their religion or beliefs	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>Any concerns that tenants have can be raised at this stage of the CCTV pilot scheme so that the council can address them accordingly. The council understands that there may be some concerns due to previous matters that caused some residents in neighbourhoods to feel victimized by the council regarding how CCTV was installed and located in Birmingham wards. The council is able to demonstrate the rationale and strategic approach for the CCTV installation in wards during the 12-month pilot and the proposed strategy, which is evidence based driven by both demand from tenants through their complaints and their tenant perception feedback.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against tenants or visitors due to their religion / beliefs, during the CCTV pilot scheme or the proposed CCTV strategy.</p> <p>The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers Act. The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed.</p>



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**Protected Characteristic - Sexual Orientation**

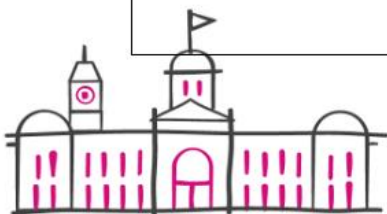
Does this proposal impact people’s sexual orientation as per the Equality Act 2010?	No
What sexual orientations may be impacted by this proposal?	
Please describe the impact to the sexual orientation characteristic	
How could you mitigate against any negative impact to the sexual orientation characteristic?	
Please describe how this proposal does not impact people due to their sexual orientation	<p>The City Housing directorate on behalf of the council will undertake consultation with residents, internal and external stakeholders between September and November 2024.</p> <p>CCTV installed in identified blocks for both the proposed strategy and 12-month pilot will be installed to the rear, front door of each block and on floors as required to capture crime and ASB reflected in the data gathered. This does not discriminate against tenants or visitors due to their sexual orientation, during the CCTV pilot scheme or the proposed CCTV strategy.</p> <p>The Code of Practice further ensures that any CCTV installation will be compliant with Data Protection and Human Rights legislation, the Protection of Freedoms Act and the Freedom of Information and Regulatory Powers Act. The Council is required to comply with the relevant legislation in relation to CCTV and to ensure that the risk of potential GDPR breaches is managed.</p>



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### Monitoring

<p>How will you ensure any adverse impact and mitigation measures are monitored?</p>	<p>There is a risk that the installation of CCTV will not be effective in preventing or reducing crime and ASB. The perceived correlation between the absence of CCTV and levels of crime and ASB within high-rise blocks are however a primary concern for tenants. There is limited mitigation against this risk, and it is proposed that by conducting a pilot programme in the first instance the council will be able to evaluate the effectiveness of CCTV within high-rise blocks without the significant financial commitment that installation of CCTV across the portfolio would require.</p> <p>The City Housing Directorate on behalf of the council will monitor the impact against the data held for the council's tenants in these areas, to ensure that these are commensurate with the overall tenant cohort. This will then feed into any appropriate measures to ensure that these groups are able to submit complaints and receive redress. At the end of the 12-month pilot scheme the council will conduct a review of the pilot scheme with a report to reflect the findings.</p> <p>The Council is mindful of the need for an evidence-based approach to the selection of high-rise blocks and neighbourhoods for the pilot programme. Whilst the installation of CCTV in some high-rise blocks but not others will disproportionately benefit those tenants and leaseholders residing in blocks where CCTV is to be installed. This selection has been based on the available intelligence and data relating to the prevalence of crime and ASB within those blocks and not on any considerations relating to protected characteristics.</p> <p>It can be argued that by selecting the 'Hot Spot' areas</p>
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	<p>where crime and ASB are highest, this programme will benefit tenants with or without relevant protected characteristics who have been subjected to above-average levels of crime and ASB during their tenancies.</p> <p>This cabinet report produced has been informed by the following data and feedback from residents:</p> <ul style="list-style-type: none"> <li>• City Housing Liaison Board</li> <li>• TSMs (tenant perception surveys)</li> <li>• Complaints</li> <li>• Resident focus groups</li> <li>• Meet the Ombudsman event (August 2023)</li> <li>• Tenant talks (quarterly events)</li> <li>• Anti-social behaviour reports</li> </ul> <p>As previously stated, Data Protection Impact Assessment (DPIA) for each block will be carried out during the 12-month CCTV pilot scheme and the proposed CCTV Strategy. This will enable reporting against known or raised protected characteristics. Regular reporting against these measures will serve to identify any groups are under or over-represented. In particular, for those groups where a potential adverse impact has been identified (disability and ethnicity).</p> <p>All DPIA assessments and the Passport to Compliance will be approved by the Head of Technology Practice Corporate Information Management. Under the general power of competence under Section 1 of the Localism Act 2011, the Council has the power to enter into the arrangements set out in this report.</p>
<p>Please enter the email address for the officer responsible for monitoring impact and mitigation</p>	<p>Hannah.Forrest@birmingham.gov.uk</p>

