



**SURVEILLANCE CAMERA
COMMISSIONER**

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Information Commissioner's Office

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



Project name: Lawns Area CCTV

Data controller(s): Padstow Town Council

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

1. Identify why your deployment of surveillance cameras requires a DPIA¹:

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

Monitoring of a publicly accessible area for prevention and detection of antisocial behaviour and criminal damage, improved public safety and confidence and to prevent the erosion of valued outdoor recreational spaces.

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

The proposal is for the deployment of a new surveillance camera system to be monitored and maintained in accordance with the SCC code of practice and governing guidance. Data will be processed under GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller.

Describe the processing

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

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

Cameras will be installed to cover Padstow Sk8 skate park and the neighbouring Lawns Play area where there has been a continuing trend of anti-social behaviour. The purpose of the proposed surveillance camera system is to address the following problems in these areas:

- 1) Security of the skate park asset and neighbouring recreational facilities from antisocial behaviour and criminal damage;
- 2) Public safety and confidence in using the skate park and neighbouring recreational facilities;

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

3) Erosion of valued outdoor recreational space for vulnerable group.

There are a number of sources of evidence supporting the need for a CCTV system. These include:

- Anecdotal information from the community;
- Physical evidence regularly removed/repaid by the Town Council e.g graffiti, alcohol and drug related detritus, littering and damage;
- Confirmation from the area's Neighbourhood Beat Manager that the skate park is the local police team's main area of focus in Padstow and is included in the team's patrol of areas known for anti social behaviour and drug taking/selling; and
- Qualitative data collated from responses to a survey regarding the play area in June 2022 that demonstrates a lack of public confidence in using the skate park and neighbouring Lawn's play area.

The objectives of the system are:

- a) Preventing damage.
- b) Reducing anti-social behaviour.
- c) Increasing public perceptions of safety in the Lawns area.
- d) Increasing successful convictions of offenders.
- e) Increasing public confidence in using the recreational facilities at the Lawns.
- f) Supporting continued development and investment by PTC in recreational facilities which are well used and valued.

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

The Council will process personal data of persons in public spaces, being Padstow Sk8, the Lawns play area and the public spaces in the immediate vicinity.

Collection of data is specific to the purposes set out in section 3 and the system will be in operation 24/7. The data collected is in the form of recorded video footage, retained on the system for 30 days from the point of recording and then automatically deleted. Images of individuals will only be released to investigating authorities in accordance with the objectives listed in the SCC code of practice.

There will be images of children, vulnerable persons, people from minority ethnic groups and religious beliefs, however this will not be known at the time of recording unless the cameras are being used proactively by appropriately trained members of staff. Any proactive monitoring of the public must be justified and a full audit trail will be maintained and monitored by the Town Clerk on a regular basis.

The system will be used in an overt manner and signage informing the public that CCTV is in operation will be displayed throughout the locations. The CCTV system does not discriminate in any way, nor does it have any analytical software that could be used to discriminate people.

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

The data owner and controller is Padstow Town Council. The Town Clerk will ensure that the system and its data are maintained in accordance with the agreed CCTV policies of Padstow Town Council.

Data will only be shared with the following third parties under specific circumstances and upon consideration of the submission of a formal CCTV Disclosure Request:

- 1) Data Subjects - in compliance with a Subject Access Requests, unless disclosure would prejudice criminal enquiries, criminal investigations or contravene the data protection rights of any third party in the footage whose identity cannot be protected.
- 2) Law enforcement agencies - where the data would assist with a specific criminal enquiry
- 3) Prosecution agencies - where the data would assist in the prosecution of anti-social behaviour and criminal activity.
- 4) Authorised investigators - such as insurance companies investigating claims in relation to anti-social behaviour and criminal activity.

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

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

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

Data from the cameras will be transmitted via an ethernet network to the NVR (Network Video Recorder). The data will be transmitted using a high encryption wireless point-to-point system and the MAC address (Media Access Control address) will be locked.

The data will be accessible from the NVR and also from the Council Offices via an internet connection and an app installed on a specified workstation. Live monitoring will only occur in exceptional circumstances such as a request by the police related to their detection of and response to unlawful activities. Any data disclosed to a third party identified in section 5 above will be downloaded to a USB. Detailed procedures and policies will ensure that recorded data is handled and used in a lawful manner.

Audio recording will not be enabled and the Town Council will not operate a watchlist or use automatic facial recognition. A data retention period of 30 days will be set and when this is met, data will automatically be destroyed. Where necessary e.g following a major incident where a large amount of data has been retained for investigation and civil proceedings, footage may be retained in a lockable evidence location for more than 30 days. The evidence location will be reviewed by the Town Clerk on regular basis and the principles of GDPR/DP 2018 will be adhered to at all times.

8. Does the system's technology enable recording?

- Yes No

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

Recording will be enabled and will be undertaken at the Padstow Town Council control room. There will be no audio recording.

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

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

Upon receipt of a completed CCTV Request form received by one of the third parties identified in section 5 above, and on the authorisation of the Town Clerk, an appropriately trained member of staff will access and view the relevant recordings.

If the incident requested is found, the offer of an on-site visit to view the data will be made. In these circumstances, the data will be disclosed by an approved member of staff in a private space where the screening cannot be observed by unintended persons including other employees of Padstow Town Council.

Where instead copies of the footage are released, the recording will be downloaded to a USB device for this purpose and encrypted. The USB will be clearly labelled and will need to be collected from the Town Council Offices by the requester unless the requester consents to the device being sent by recorded delivery post. The requester will need to sign the relevant collection form, as appropriate.

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

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

• To respond to a subject access request but only whereby doing so would not be likely to i) prejudice the prevention and detection of crime; ii) prejudice the apprehension and prosecution of offenders; or iii) contravene the data protection rights of any third party in the footage whose identity cannot be protected.

• To investigate and respond to damage and mistreatment of Town Council property, where an appropriately trained member of staff is authorised by the Town Clerk to view the recordings of a defined timeframe. This will not involve monitoring in real time.

Real time monitoring will only happen in extreme circumstances where a legitimate request for assistance is received from the police and authorisation is granted by the Town Clerk. Monitoring will only be undertaken by an appropriately trained member of staff.

Logs of all access to data will be kept in accordance with agreed CCTV Policies of Padstow Town Council.

Consultation

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

Stakeholder consulted	Consultation method	Views raised	Measures taken
Members of the public/data subjects	Online survey with hard copy version available, promoted via social media, school newsletter and posters around the parish including the location of the proposed CCTV system.	<p>Support for CCTV with 85.39% of respondents (89 responses received in total) advising they consider it a "very useful" tool to combat crime and antisocial behaviour.</p> <p>Of the specific proposal, 96.63% of respondents voted in favour of the proposal relating to the skate park and 96.59% voted in favour of the proposal relating to the play area.</p> <p>The survey demonstrated that many respondents felt the proposal would increase how often they used these facilities due to an expectation that they would feel safer and more confident in doing so. Several respondents outlined that concerns over anti-social behaviour impacted their current use.</p>	Consultation reinforces need for CCTV. Continue to progress proposal.
Neighbourhood Policing Team	<p>Email correspondence prior to development of proposal</p> <p>Consultation shared with key contact and invited to respond</p>	<p>Area of focus is known to police for anti-social behaviour and included in their patrols.</p> <p>Fully supportive of CCTV in proposed area. Specific comment: We fully support the installation of CCTV in this area to deter ASB and crime and to detect any offences. CCTV is used widely for this purpose and the use of the CCTV is governed by GDPR to ensure</p>	<p>Comments considered as part of planning process.</p> <p>Reinforces need for CCTV. Continue to progress proposal.</p>

		only certain individuals can use the footage to prevent and detect crime CCTV System.	
Businesses, organisations and landowners based in or adjacent to the Lawns area.	Consultation shared with key contacts for each and invited to respond	No direct comment received from these organisations	n/a

Consider necessity and proportionality

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

Parish Councils have a duty under Section 7 of the Crime and Disorder Act 1988 to consider the implications of crime and disorder in the exercise of its various functions; and to do all that it reasonably can to prevent a) crime and disorder in its area (including anti-social and other behaviour adversely affecting the local environment); and b) the misuse of drugs, alcohol and other substances in its area.

The lawful basis therefore for using the surveillance camera system (CCTV) is GDPR Article 6(1)(e) Processing is necessary for the performance of a task carried out in the public interest, or in the exercise of official authority vested in the controller.

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

Appropriate signage will be placed in and around the area where the cameras are placed.

Information relating to the location of the cameras, Surveillance Camera Commissioner's Code of Practice, DPIA, Passport to Compliance documents, privacy notice and operational procedures and policies will be published on the Town Council's website.

In addition to the above, the public consultation will have increased expectations of surveillance amongst data subjects.

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

The main purpose of the CCTV system is to contribute to the reduction of anti-social behaviour in the lawns area, support prosecutions for criminal damage/vandalism and improve perceptions of public safety and confidence in using the skate park and neighbouring facilities. The facilities are accessible 24/7 therefore the cameras will be in operation 24/7 and will record all activities occurring within their viewing capacity. The images recorded must be maintained to a standard where it is possible to be used in the identification, apprehension and prosecution of offenders, though the viewing of data will only occur when a legitimate and lawful request is made, for example, by the police or the data subject. Access to the data and the management of the system will be controlled through clear policies and procedures agreed by the Town Council. These policies and procedures will include a provision for their regular review in order to determine their effectiveness and adequacy. This will include a procedure for an annual audit of the camera system to ensure that each camera can reasonably be

considered to capture data which supports the purposes identified above, and captures the minimum data possible to achieve these aims.

To help determine whether the system is delivering the benefits it has been deployed for, the Council will review the problems which the system seeks to address within 18 months of the system's implementation. In doing so, consideration will be given to quantitative data relating to reported incidents in the area and qualitative data through consultation with the community and the Neighbourhood Policing team.

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

Data will be stored for a maximum of 30 days before it is automatically deleted by the digital management system. 30 days is considered to be sufficient for subject access requests and investigatory requests to be made and 30 days/1 month is generally accepted industry practice.

Where necessary e.g following a major incident where a large amount of data has been retained for investigation and civil proceedings may be retained in a lockable evidence location for more than 30 days. The evidence location will be reviewed by the Town Clerk on a regular basis.

16. Retention Procedure

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

Footage may be retained in an evidence locker for more than 30 days where required for an investigation, civil claim or subject access request. The evidence locker will be reviewed on a quarterly basis.

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

An external contractor is commissioned to secure and protect our IT systems from unauthorised intrusion. The contractor's systems and processes are ISO 27001 certified for data security.

Data will be accessible from the NVR and also from the Council Offices via an internet connection and an app installed on a specified workstation. Access to the NVR location and workstations are restricted and physically secured. Access to the system will be restricted and will incorporate passwords for

authorised operators. Access will be recorded and the system will be subjected to regular audits Use of the system will be clearly outlined in Town Council policies and procedures.

Data from the cameras will be transmitted via an ethernet network to the NVR. The data will be transmitted using a high encryption wireless point-to-point system and the MAC address (Media Access Control address) will be locked.

Data will be released to police officers using a USB supplied by them, encrypted USB are related to third parties such as insurance companies and solicitors in person or via recorded delivery and once receipt is confirmed an email will be sent detailing the encryption code. No international transfers will be made.

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

Padstow Town Council CCTV policies and procedures are fully compliant with the GDPR/DPA 2018 for general disclosure access requests and CCTV related subject access requests.

Information on subject access can be found on the Town Council website and all requests are usually initially dealt with by the Assistant Clerk.

Any complaints are dealt with through the Council's complaints procedures.

The above information can all be viewed online here: <https://padstow-tc.gov.uk/your-council/council-policies-procedures/>

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

Street lighting is already in operation in this area. Improved lighting by way of a PRI light was introduced in June 2019; this was ineffective, doing little to improve the lack of natural surveillance. Padstow Town Council does not have the capacity to undertake additional patrols outside of working hours. There is an employee presence periodically during the day however, employees have limited powers, if any, to tackle crime or anti-social behaviour.

The skate park is already included in the Wadebridge Neighbourhood Team's regular patrols of areas known for anti-social behaviour and drug taking/selling.

The nature of the recreational facilities precludes the option to increase physical protection or prevention such as locks and fences.

Continuous camera operation and recording is necessary as area is a public space and offences can be at varied times.

Privacy zones can be programmed to cameras along with operator training and regular audits can help to mitigate any potential intrusion.

Community consultation shows overwhelming support for CCTV operation in areas proposed.

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

The agencies that are granted access

How information is disclosed

How information is handled

Are these procedures made public? Yes No

Are there auditing mechanisms? Yes No

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

The CCTV operation as a whole is subject to annual audit. This includes the use of cameras, suitability of camera locations and how data is accessed, disclosed and handled as detailed in the Town Council's policies and procedures relating to CCTV. Policies and procedures will also be reviewed on an annual basis.

Identify the risks

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

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Invasion of privacy	Remote, possible or probable Possible	Minimal, significant or severe Significant	Low, medium or high Medium
Excessive or inappropriate monitoring	Remote	Significant	Medium
CCTV policies and procedures not in place or not robust enough-leading to inconsistencies etc	Possible	Significant	Medium
Inappropriate disclosure of personal data	Remote	Severe	Medium

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Personal data retained for longer than necessary	Remote, possible or probable Remote	Minimal, significant or severe Minimal	Low, medium or high Low

Address the risks

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

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

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk			
Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
Invasion of privacy - due to nature of CCTV in the public realm, there will always be a degree of intrusion but the use is considered proportionate and the privacy rights of people in private spaces are not adversely affected because the cameras do not overlook residential properties.	Eliminated reduced accepted Reduced	Low medium high Low	Yes/no Yes
Excessive or inappropriate monitoring - there will always be a level of intrusion but the CCTV system will not be actively monitored in real time - except in exceptional circumstances as identified in the Council's CCTV policies and procedures. The equipment is stored in an area with restricted access and review/control equipment is password protected. System users are restricted to specified Town Council employees and, where there is a legitimate need, to the Council's consultants or contractors such as its IT provider. All system users will have relevant skills and training in the operational, technical and privacy considerations required for accessing, recording, disclosing or otherwise processing CCTV images and a record of authorised system users will be maintained.	Reduced	Low	Yes

CCTV policies and procedure not in place or not robust enough - leading to inconsistencies etc. Policies and procedures will be reviewed annually in line with the latest advice from the Surveillance Camera Commissioner and taking account of any new legislation.	Reduced	Low	Yes
Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved?
Inappropriate disclosure of personal data - Padstow Town Council will only release recorded data where it is permitted to do so to law enforcement agencies and insurance companies. Access is restricted to authorised system users only. Members of the public can submit a subject access request to view or receive recorded footage of themselves, in accordance with their rights, but only where doing so would not contravene the data protection rights of any third party in the footage whose identity cannot be protected unless it is satisfied that the individual has provided their express consent to the disclosure or it is reasonable, having regard to the circumstances, to comply without the consent of the individual.	Eliminated reduced accepted Reduced	Low medium high Low	Yes/no Yes
Personal data retained for longer than necessary - recorded data is automatically deleted by the digital management system after 30 days unless the Town Council is notified before deletion that they are required by a data subject, insurance company, the police or other investigation agency that the data is required. Data removed from the system following an Application For CCTV Data Access will be retained in a lockable evidence location and policies and procedures will ensure that this is regularly monitored and data is not left indefinitely.	Accepted	Low	Yes

Authorisation

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

Item	Name/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion.
Residual risks approved by:		If you identify a high risk that you cannot mitigate adequately, you must consult the ICO before starting to capture and process images.
DPO advice provided by:		DPO should advise on compliance and whether processing can proceed.
Summary of DPO advice		
DPO advice accepted or overruled by: (specify role/title)		If overruled, you must explain your reasons.
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons.
Comments:		

Date and version control: 19 May 2020 v.4

This DPIA will be kept under review by: The Town Clerk		The DPO should also review ongoing compliance with DPIA.
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APPENDIX ONE

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

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

Location type	Camera types used	Amount	Recording	Monitoring	Assessment of use of equipment (mitigations or justifications)
Padstow Sk8 Skate Park, Lawns Car Park	Fixed with infra red	1	24hrs	n/a	The privacy level expectation in the skate park is low, it is an open air public space. The space is well signed with appropriate signage for CCTV its use and purpose with contact details. History of vandalism and asb.
Lawns U12s Play Area, Lawns Car Park	Fixed infra red	2	24hrs	n/a	The privacy level expectation in the play area is low, it is an open air public space. The space is well signed with appropriate signage for CCTV its use and purpose with contact details. History of vandalism and asb. Use of 2 cameras is to mitigate for areas of concealment created by play equipment.

APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

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

Matrix Example:

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

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