

TownSafe Watchlist System

Data Protection Impact Assessment (DPIA)

Prepared for: PubWatch / BIG / BID Partnerships

Provider: Amorphic

1. System Overview

TownSafe is an on premise watchlist alert system deployed within licensed venues to assist in the identification of individuals subject to locally agreed PubWatch exclusion schemes. All facial comparison processing is conducted locally on-site using edge-based AI hardware. No live CCTV streams are transmitted to external servers. No equipment in the venues has access to the known persons images.

2. Roles

Organisation	Role
Participating Venue	Joint Data Controller
Local PubWatch Group	Joint Data Controller
Amorphic	Data Processor

3. Lawful Basis for Processing

Processing is undertaken under UK GDPR Article 6(1)(f) Legitimate Interest for the purposes of crime prevention, public safety and staff protection. Special Category biometric processing is supported under Article 9(2)(g) where required under substantial public interest.

4. Data Types Processed

- Facial image of excluded individuals
- Biometric facial encoding (mathematical template)
- Time and date of potential match
- Venue identifier
- Staff verification response

5. Processing Flow

Watchlist images are uploaded securely by authorised PubWatch administrators. Live camera frames are analysed locally and compared to encrypted biometric templates stored on the device. Potential matches generate alerts for human review by venue staff.

6. Necessity & Proportionality

Processing is limited to individuals subject to locally agreed exclusion schemes. No identification is automated without human review. No data is processed for marketing or profiling purposes.

7. Risk Assessment

Primary risks include:

- False positive identification
- Unauthorised access to watchlist
- Excessive retention

8. Mitigations

- Human verification prior to action
- Encrypted template storage
- Role-based access controls
- Configurable retention policies
- Full audit logging
- Isolated databases

9. Retention Policy

Watchlist entries must be reviewed at locally agreed intervals. Alert images are retained for a configurable period (recommended 5 days) unless required for evidential purposes.

10. Data Subject Rights

Individuals may request access, rectification or deletion through the local PubWatch scheme administrator.

11. Human Review

All alerts are reviewed by trained venue staff prior to any intervention. TownSafe does not make automated decisions.

12. Security Measures

- On-device biometric processing
- Encrypted communications
- Secure administrator login
- Access audit trails

13. Governance

Participating venues and PubWatch groups are jointly responsible for:

- Maintaining accurate watchlist data
- Reviewing retention intervals
- Responding to data subject requests

Contact

Amorphic www.amorphic.co.uk