

Village Hall, Playing Field and Play Area CCTV Data Protection Impact Assessment

This document explains how Newbold Verdon Parish Council record their DPIA process and outcomes. It follows the process set out in the Information Commissioner Officer DPIA guidance and European guidelines on DPIAs.

Submitting controller details

Name of controller	Naseby Parish Council
Subject/title of DPO	Local Authority
Data Protection Officer (Parish Council)	Josie Flavell Information Commissioners Office (ICO)

Step 1: Identify the need for a DPIA

To further protect community assets Naseby Parish Council will install CCTV to deter crime, theft and anti-social behaviour and to record such incidences and enable the Police and authorities to take legal action, such as prosecution.

The Data Impact Assessment is required due to the CCTV monitoring all users (general public) of the playing field, play area and village hall.

Step 2: Describe the processing

The CCTV system will be connected to the main hub based inside the Village Hall and will be recorded and collected via a wireless system. The data will be held remotely by Naseby Parish Council and only for a maximum of 30 days, at which point it will be deleted, unless it is required for legal purposes.

The data will only be shared with the Police and other relevant authorities, and members of public, should they have a reasonable reason to request the data via a Subject Access Request form.

Data will only be stored on a USB memory device, CDROM or other memory storage device should there be a need to share the data with the Police for legal reason.

Describe the scope of the processing:

The CCTV system will be running 24 hours a day, seven days a week and will therefore be transmitting/streaming data to the main hub within the Village Hall constantly. However, this data will only be stored for a maximum of 30 days unless otherwise required by the Police for prosecution reasons due to theft, criminal activity, or anti-social behaviour issues.

The data collected will involve recording all users and their use of the play equipment, the entire playing field, up to and including the perimeter of such and also the Village Hall car park and entrance.

The system is set up so as not to intrude on the privacy of any neighbouring private properties and will only record within those aforementioned parameters.

Those affected by the use of CCTV will be the general public i.e., all those who use the playing field, play area and the Village Hall external facilities, including the footpaths within it. This includes all age ranges.

Describe the context of the processing:

The Parish Council's relationship to those using the playing field, play area and external Village Hall facilities, is as their local authority for the parish.

The general public will have no control over the use of the CCTV and can only submit a Subject Access Request for data/footage/images from the system for a reasonable reason, which the Parish Council deem necessary, due to the Data Protection Act, General Data Protection and safeguarding regulations.

Due to the nature of the facilities, children, adults of all ages and vulnerable individuals may be recorded. However, the Parish Council adhere to all regulations as set out by central Government and law, and are also signed up to the Information Commissioner Office (ICO) scheme concerning data protection and its use.

As owners of the playing field and play area, Council felt it prudent to install CCTV to ensure the safety and security of all its users and its assets, along with those owned by the Village Hall.

Naseby Parish Council will only use data recordings for legal matters and will not share the data with anyone outside of its remit, the Police or other relevant authorities and only if absolutely necessary, where there is a reasonable request to do so.

All shared data will ensure the privacy of those made visible by the recording, by blurring out/obscuring all individuals with the exception of the perpetrator/s, to protect their identity.

Describe the purposes of the processing:

The Parish Council want to ensure the safety and security of all users of the playing field and play area and its assets.

The benefit to processing this data allows the authorities such as the Police to clearly identify any individuals involved in anti-social behaviour, theft or burglary and to apprehend them.

It also allows the general public to feel safe in the knowledge that should a criminal act take place, in particular towards a person or minor, there will be footage of the incident and the Police will be able to act and take appropriate action.

Step 3: Consultation process

Consider how to consult with relevant stakeholders:

The Parish Council have already consulted with the Village Hall, who are in full support of this initiative.

The CCTV system has also been subject to Council discussion via monthly meetings for several months prior to its installation, allowing other members of public the chance to state their views. Records of this are available via the Parish Council agendas and minutes on its website.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular:

Naseby Parish Council are fully compliant with all laws and regulations surrounding the CCTV system and its use.

As the Proper Officer (Clerk) will be the main data controller on behalf of council, the data will held securely and again, will not be used or viewed unless there is a reasonable reasons to do so.

They too adhere to the same rules, laws and schemes as the Parish Council and will ensure the system is run in accordance with the aforementioned.

The system, will ensure the safety and security of all its user and the Parish Council's assets.

Step 5: Identify and assess risks

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
Theft of equipment	Possible and probable	Minimal	Low with CCTV
Misuse of equipment by users	Possible and probable	Minimal to significant	Low to medium
Physical harm to users, in particular minors Whilst using equipment	Possible	Minimal to severe	Low to High
Physical harm to users, in particular minors, by other users, i.e. members of public	Remote to Possible	Minimal to severe	Low to high
Anti-social behaviour	Probable	Significant	Medium

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Anti-social behaviour	CCTV in operation	Reduced to eliminated	Low	
Theft of equipment	CCTV in operation	Reduced to eliminated	Low	
Misuse of equipment by users	CCTV in operation	Reduced to eliminated	Low	
Physical harm to users, in particular minors whilst using equipment	CCTV in operation	Reduced to eliminated	Low	Yes
Physical harm to users, in particular minors, by other users, i.e. members of public	CCTV in operation	Reduced to eliminated	Low	

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Naseby Parish Council (full council)	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Naseby Parish Council (full council)	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Yes	DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>Summary of DPO advice:</p> <p>The DPO has advised all areas meet with current compliance and processing of data can take place in line with Council's DPIA and CCTV Policy.</p>		
DPO advice accepted by:	Accepted Date: 20/10/2021	If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:	The Data Controller – Parish Clerk	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:	The Parish Clerk every 12 months and will ensure compliance is maintained on an ongoing basis.	The DPO should also review ongoing compliance with DPIA