

Data Protection Impact Assessment (DPIA)

For CCTV System at Fen View Play Area, Fen View, Thorndon IP23 7JW

Parish Council Name: Thorndon Parish Council

DPIA Completed by: Odile Wladon, clerk

Date: 30th October 2025

Review Date: October 2026

1. Introduction

Thorndon Parish Council (the Council) is installing closed-circuit television (CCTV) surveillance system to enhance public safety and deter crime. The Data Protection Impact Assessment (DPIA) has been prepared to assess the impact of the CCTV system on individuals' privacy and ensure compliance with the UK Data Protection Act 2018, the General Data Protection Regulation (GDPR), and other relevant data protection legislation.

Under section 17 of the Crime and Disorder Act 1988 a local council has a duty to exercise its various functions with due regard to the likely effect of the exercise of those functions on, and the need to do all that it reasonably can to prevent:

- Crime and disorder in its area (including anti-social behaviour and other behaviour adversely affecting the local environment).
- The misuse of drugs, alcohol and other substances in its area and;
- re-offending in its area.

In addition, Section 31 of the Local Government and Rating Act 1997 permits a local council, in order to prevent or detect crime to:

- install and maintain any equipment;
- establish and maintain any scheme, or
- assist others to install and maintain any equipment or to establish and maintain any scheme.

Consultation was undertaken as follows:

- Reports of damage to play equipment were noted at the Parish Council meeting in October 2020.
- Investigations into CCTV systems started October 2020.
- Council received comments received that further areas used by the Primary School were experiencing vandalism in December 2020 meeting.
- Estimated costs were reviewed at Parish Council meeting held in January 2021.
- Costs accepted for CCTV and servicing scheme March 2021
- Equipment was installed in April 2021.

2. Purpose and Scope of the Processing

The primary purpose of the CCTV system is to:

- To deter and detect criminal activity (e.g. vandalism, drug use, antisocial behaviour).
- To enhance the safety and security of the community.
- To protect public property and assets maintained by the Parish Council.
- Provide evidence for the police if criminal activities occur.

3. Scope of the CCTV System

The CCTV system will be deployed in the following areas: Fen View Play Area, Fen View, Thorndon IP23 7JW. It will be a fixed CCTV with a data only SIM.

4. Data Processing Activities

The CCTV system involves the following processing activities:

- **Collection of visual data:** CCTV cameras will capture visual images and videos of individuals within the monitored areas.
- **Storage of footage:** footage will be stored securely on a cloud based system for a retention period of 30 days, after which it will be automatically overwritten unless it is needed for legal or investigative purposes.
- **Access to footage:** authorised Parish Council personnel or the police may access the footage if required by law or for specific security purposes.
- **Transmission of footage:** footage may be transmitted securely to the police if required by an official request or if it serves the public interest in the case of criminal activity or emergencies.

5. Legal Basis for Processing

The legal basis for processing personal data under the UK GDPR is as follows:

- Article 6(1)(f) – Legitimate interest: the processing is necessary for the legitimate interest pursued by the Council, namely public safety, crime prevention, and the protection of public property. The use of CCTV is proportionate to achieving these objectives.
- Article 6(1)(c) – Legal obligation: the Council may be required to provide footage to the police or other authorities in certain circumstances, such as for criminal investigations or to comply with legal obligations.

6. Data Minimisation

The principle of data minimisation will be followed to ensure that only the necessary data is collected and stored:

- CCTV cameras will be positioned to monitor public areas only, ensuring minimal intrusion into individuals' privacy.
- There will be no audio recording, as visual data alone is deemed sufficient for the purposes of crime prevention and public safety.
- Only relevant footage will be retained, with unnecessary footage being automatically overwritten or deleted after the retention period has expired.

7. Risk Assessment

The following potential risks have been identified regarding the CCTV system:

- **Inadvertent Capture of Personal Data:** There is a risk of capturing footage of individuals who are not the intended subjects of monitoring, such as private individuals passing by the monitored areas.

- *Mitigation:* Cameras will be positioned carefully to monitor only relevant areas and avoid capturing footage of private individuals who are not engaged in public activities.
- **Data Security Risks:** There is a risk that CCTV footage could be accessed by unauthorised individuals.
 - *Mitigation:* The Council will implement strong security measures, including password-protected access, and regular audits of who has accessed the footage. Only authorised personnel will have access.
- **Excessive Retention of Data:** Retaining footage longer than necessary could violate the data retention principles of the UK GDPR.
 - *Mitigation:* Footage will be stored for a limited period (30 days) and will be automatically overwritten unless needed for legal or security purposes.

8. Privacy Risks and Mitigation

The CCTV system poses several privacy risks that will be mitigated as follows:

- **Intrusion into Privacy:** Continuous surveillance in public areas may be seen as an invasion of privacy, especially if individuals are recorded in areas where they have a reasonable expectation of privacy.
 - *Mitigation:* Access controls will be in place to restrict the use of CCTV footage to authorised personnel only. CCTV data will be stored and logs will track all access to the footage.
- **Unauthorised Access to Footage:** there is a risk that CCTV footage may be accessed by individuals who are not authorised to do so.
 - *Mitigation:* Access controls will be in place to restrict the use of CCTV footage to authorised personnel only. CCTV data will be securely stored and logs will track all access to the footage.

9. Mitigation measures and Safeguards

To protect the privacy and security of individuals, the following safeguards will be put in place:

- **Clear signage:** signs will be placed in all monitored areas, informing individuals that they are being recorded by CCTV.
- **Access control:** footage will be accessible only to authorised personnel, and access will be logged to ensure accountability.
- **Data security:** CCTV footage will be stored securely, with strict controls on access and transmission. The storage system will be regularly reviewed for compliance with data protection laws.
- **Training:** All personnel responsible for managing or accessing CCTV footage will receive training on data protection and confidentiality to ensure they understand their responsibilities under GDPR.

10. Data retention and disposal

- **Retention period:** CCTV footage will be retained for a maximum period of 30 days, after which it will be automatically deleted unless it is required for ongoing investigations, legal action, or public safety concerns.
- **Deletion of footage:** footage that is no longer needed for its intended purposes will be securely deleted to prevent any unauthorised access or retention of personal data.

11. Conclusion

This Data Protection Impact Assessment identifies and mitigates the risks associated with the use of CCTV by Thorndon Parish Council. The system is being implemented with the aim of enhancing public safety while minimising the impact on privacy. The Council is committed to ensuring the system operates in compliance with UK data protection laws, and it will regularly review the system to ensure it remains compliant and proportionate.

12. Data Controller and Contact Details

Data Controller: Thorndon Parish Council

Email: clerk@thorndon-pc.gov.uk Telephone: 01449 766766

13. Review and Approval

This DPIA will be reviewed annually, or in response to significant changes to the system, legislation, or risks related to data protections. If any changes occur, the DPIA will be updated accordingly.

Approval Date: 6th November 2025

Review Date: October 2026