

Data Protection Impact Assessment (DPIA) for CCTV – Nash Parish Council

1. Introduction

Nash Parish Council (the "Council") is installing a Closed-Circuit Television (CCTV) surveillance system to enhance public safety and deter crime within the parish. This 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.

2. Purpose of CCTV System

The primary purpose of the CCTV system is to:

- Deter crime and anti-social behaviour.
- Monitor areas of public concern.
- Enhance safety for residents and visitors to the recreation ground in Nash.
- 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:

- Recreation ground, Stratford Road, Nash

The cameras will be actively recording 24 hours a day, 7 days a week.

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 the Council's servers for a retention period of **14 days**, after which it will be automatically overwritten unless it is needed for legal or investigative purposes.
- **Access to Footage:** Authorised-Parish Council personnel, the police, or security personnel, 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 interests 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.
- Audio recording will be disabled, 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 (**14 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:* The CCTV system will be restricted to monitoring public areas where individuals do not have an expectation of privacy. Signs will be placed in visible locations to inform the public that CCTV is in operation.
- **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.

10. Mitigating Measures and Safeguards

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

- **Clear Signage:** Signs will be displayed 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 .

11. Data Retention and Disposal

- **Retention Period:** CCTV footage will be retained for a maximum period of 14 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.

12. Conclusion

This Data Protection Impact Assessment identifies and mitigates the risks associated with the use of CCTV by Nash 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.

13. Review and Monitoring

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

Date of Review: March 2026

Approved by: Nash Parish Council on 20th March 2025