

# UP HATHERLEY PARISH COUNCIL DPIA

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## Submitting controller details

Name of controller	KATHRYN OAKEY
Subject/title of DPO	CCTV ASSESSMENT
Name of controller contact /DPO (delete as appropriate)	

## Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

DUE TO ISSUES AT THE HALL AND UNAUTHORISED ENTRY DISRUPTING AND UPSETTING USERS A RISK WAS IDENTIFIED. WORKING WITH THE POLICE WE IDENTIFIED THAT CCTV CAMERAS WOULD BE A USEFUL DETERRANT AND WOULD ADD COMFORT TO HALL USERS TO ALLOW THEM TO CONTINUE USING THE HALL CONFIDENT THAT THEY WILL NOT BE THREATENED. WORKING WITH HALL USERS TO ENSURE THAT THEY WOULD BE HAPPY WITH THIS ADDITIONAL SECURITY ANALYSIS WAS CARRIED OUT TO ENSURE THE BEST LOCATIONS FOR CCTV CAMERAS WHILST MINIMISING DISRUPTION FOR HALL USERS.

## Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

CCTV IS TO BE COLLECTED AND STORED ON A LOCKED DVD PLAYER. ACCESS WILL BE RESTRICTED AND DATA WILL ONLY BE SHARED WITH THE POLICE. NO RECORDING WILL TAKE PLACE INSIDE THE HALL AND ALL CAMERAS WILL BE DIRECTED TO AREAS OF ENTRY INTO THE HALL.

**Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

CAMERAS WILL CONTINUALLY RECORD AND THE DVD PLAYER WILL CONTINUALLY BE OVERWRITTEN AS DATA IS RECORDED. DATA COVERAGE IS LIMITED TO THE OUTSIDE OF THE HALL.

**Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

ANYONE USING THE HALL OR ATTEMPTING TO ACCESS THE HALL WILL BE RECORDED AND THIS COULD INCLUDE CHILDREN ATTENDING CLASSES AT THE HALL. ALL HALL USERS HAVE BEEN NOTIFIED AND ARE IN AGREEMENT THAT THE CCTV IS IN USE AS A DETERRENT TO PREVENT UNAUTHORISED ACCESS TO THE HALL THAT HAD TURNED VIOLENT ON A COUPLE OF OCCASIONS. USERS ARE AWARE THAT THE ONLY PEOPLE VIEWING THE DATA WOULD BE THE DATA CONTROLLER AND THE POLICE, AND THIS WOULD ONLY BE WHERE AN INCIDENT OCCURS.

**Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

THE PURPOSE OF THE CCTV IS TO PREVENT FURTHER UNAUTHORISED ACCESS TO THE HALL AND TO PROVIDE THE POLICE WITH USABLE EVIDENCE.

### Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

ALL HALL USERS WERE CONSULTED VIA EMAIL PRIOR TO INSTALLATION, SECURITY EXPERTS AND THE POLICE WERE CONSULTED PRIOR TO INSTALLATION. USERS OF THE HALL ARE KEPT UPDATED ON ALL INSTANCES AT THE HALL.

## Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

ALL USERS ARE KEPT INFORMED ABOUT THE USE OF CCTV AT THE HALL, AND DATA IS NOT KEPT FOR LONGER THAN NECESSARY. RECORDINGS ARE NOT VIEWED AND THE DVD PLAYER IS KEPT IN A LOCKED CABINET. VIEWING WOULD ONLY TAKE PLACE IF AN INCIDENT OCCURRED AND WOULD BE DONE SO IN CONJUNCTION WITH THE POLICE AND DATA CONTROLLER.

## Step 5: Identify and assess risks



<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
UNAUTHORISED ACCESS TO HALL WHILST GROUPS ON SITE	Remote, possible or probable  POSSIBLE	Minimal, significant or severe  SIGNIFICANT	Low, medium or high  HIGH

## 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
ACCESS	CCTV	Eliminated reduced accepted  REDUCED	Low medium high  LOW	Yes/no  YES

## Step 7: Sign off and record outcomes

<b>Item</b>	<b>Name/position/date</b>	<b>Notes</b>
Measures approved by:	FULL COUNCIL JULY 2023	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	KATHRYN OAKLEY, CLERK	DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice: CLERK REVIEWED AND DISCUSSED OPTIONS WITH POLICE AND ADVISED PARISH COUNCIL RE BEST OPTION		
DPO advice accepted or overruled by:		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:		

This DPIA will kept under review by:	KATHRYN OAKEY, CLERK	The DPO should also review ongoing compliance with DPIA
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