

Privacy Impact Assessment for CCTV Installation at Public Building and Public Space

1. Introduction

Old Catton Parish Council operates CCTV cameras in certain public buildings and public spaces to enhance community safety, protect Council property and assets, and assist in the prevention and detection of crime.

This Privacy Impact Assessment (PIA) assesses the necessity and proportionality of CCTV use, the risks to individuals' rights and freedoms and the measures in place to ensure compliance with data protection laws.

2. Purpose and Objectives of CCTV Installation

- To protect Parish Council property and assets.
- To deter and detect criminal activity.
- To ensure the safety and security of residents, visitors, staff, and volunteers.
- To provide evidence for law enforcement agencies to aid in criminal investigations or legal proceedings.

CCTV will not be used for:

- Routine monitoring of staff performance.
- Covert surveillance (unless separately authorised under legislation).
- Any form of biometric identification or facial recognition.

3. Description of the CCTV System

- **Locations:** Cameras are installed only in locations where monitoring is necessary and proportionate, including entrances, exits and communal areas of public buildings and relevant external public spaces. Cameras will not be directed at residential windows or other areas where there is a heightened expectation of privacy.
- **Features:** Static or limited-zoom high-definition recording with low-light capability.
- **Audio:** No audio recording is undertaken.
- **Access:** Recorded images are accessible only to authorised personnel and stored securely.

4. Legal Basis for Processing

The primary lawful basis under UK GDPR is:

- Article 6(1)(e) performance of a task carried out in the public interest or in the exercise of official authority.
 - The Council relies upon this statute relating to community safety, the protection of public assets and the maintenance of public spaces.
 - The processing of special category data is not anticipated because the system does not involve biometric identification or the intentional recording of sensitive data. If such processing were to take place, a further PIA and appropriate policy document would be completed.
 - The Council has considered the legitimate expectations of individuals entering Council-owned land and is satisfied that CCTV monitoring in these locations would reasonably be expected.

- Data (Use and Access) Act 2025

The Council notes that the Data (Use and Access) Act 2025 has introduced the concept of recognised legitimate interests, including crime prevention and public security. Once the relevant provisions and ICO guidance are fully in force, the Council will review whether elements of CCTV operation may also fall within this category.

5. Assessment of Privacy Risks

- **Risk:** Intrusion into individuals' privacy.
 - **Mitigation:** Cameras positioned to avoid unnecessary viewing of homes or private areas; privacy masking where appropriate.
- **Risk:** Excessive or disproportionate monitoring
 - **Mitigation:** Cameras installed only where necessary and reviewed regularly; no covert monitoring without specific legal authorisation.
- **Risk:** Unauthorised access to footage.
 - **Mitigation:** Access is restricted to the Clerk, nominated officers and Police where lawfully required.
- **Risk:** Data retention longer than necessary.
 - **Mitigation:** Data will be retained for no longer than 30 days unless required for legal proceedings.

6. Proportionality and Necessity

CCTV is considered necessary to:

- Address concerns about crime and anti-social behaviour in public spaces.
- Protect public assets and buildings.
- Support law enforcement when incidents occur.

It is proportionate because:

- The least intrusive locations and angles are selected
- No audio recording or biometric recognition is used
- Signage ensures the public are informed
- Cameras are not routinely monitored in real time. Recorded footage is only viewed where necessary following an incident or complaint.
- Retention periods are short and reviewed regularly

7. Data Management

- **Data Retention:** Footage will be stored for 30 days and automatically deleted unless it is required for ongoing investigations or legal proceedings.
- **Access:** Only authorised personnel will have access to the data.
- **Data Security:** Footage is encrypted and stored in secure servers.
- **Disclosure:** Disclosure to third parties (including Police) will only occur where lawful and on documented request.
- **Data Security:** Footage is stored securely and access is restricted to authorised personnel using secure authentication. The Council will take reasonable steps to protect CCTV equipment and associated systems from unauthorised access, including maintaining appropriate passwords, restricting administrative access and applying software or firmware

updates where these are made available by the manufacturer. The Council will ensure any replacement or newly installed CCTV equipment is selected with appropriate cyber security features proportionate to the risks associated with the system.

- **Record Management:** All access to CCTV recordings, exports of footage and disclosures to third parties will be recorded within the Council's CCTV Access Log.

8. Individuals' Rights (Subject Access Requests)

Individuals have the right to request access to images in which they appear.

In line with UK GDPR, the Data Protection Act 2018 and the Data (Use and Access) Act 2025:

- Searches for footage will be reasonable and proportionate
- Individuals may be asked to provide date, time and location to help locate footage
- Statutory deadline may be paused while clarification is awaited
- Third-party images will be redacted where reasonably possible

Requests may be refused where an exemption applies (eg prejudice to crime prevention).

9. Signage

Clear and prominent signage is displayed in all areas where CCTV is operational.

10. Review and Monitoring

The PIA will be:

- Reviewed annually
- Reviewed sooner where:
 - New technology or analytics are introduced
 - Locations or purposes materially change
 - New legislation or ICO guidance significantly affects CCTV use
 - Additional CCTV cameras are installed or existing cameras are relocated
 - Camera fields of view are materially altered
 - Audio recording, automatic number plate recognition (ANPR), facial recognition or other AI-enabled analytics are introduced
 - Significant changes are made to the Council's CCTV infrastructure or storage arrangements
 - Any significant data protection, cyber security or operational incident indicates that a review is necessary.

Operation compliance will be monitored regularly.

In addition to the annual review, the Council will periodically consider whether each camera remains necessary and proportionate, whether its purpose continues to exist, and whether a less intrusive measure could reasonably achieve the same objective.

11. Conclusion

The Council considers that the use of CCTV is necessary and proportionate to support community safety and the protection of Council property and that appropriate safeguards are in place to protect

individuals' privacy and data protection rights. This PIA will continue to be reviewed in light of evolving legislation and ICO guidance.

Ms Sarah Vincent
Clerk of the Council

Completed: November 2024

Adopted: 13th January 2025

Reviewed: August 2026

Addendum to CCTV Privacy Impact Assessment (PIA)

February 2026

12. Incidental Capture of Adjacent Land (School Boundary)

The Council has reviewed the positioning of the CCTV camera located at the access route to the Recreation Ground where it adjoins land occupied by the school.

The primary purpose of this camera is to monitor Parish Council land, specifically:

- The access route to the Recreation Ground
- The protection of Council assets
- The safety of users of the public space.

The Council acknowledges that a limited area beyond its boundary, specifically the immediate vicinity of the side gate within the school boundary, may be captured in the field of view.

This capture is:

- **Incidental**, and not the purpose of the processing
- **Limited in scope**, including the gate and a small adjacent area within the school boundary
- **Partially screened by natural features**, including a mature tree which significantly restricts visibility for much of the year
- **Unavoidable** in order to effectively monitor the access point and prevent crime and anti-social behaviour

Assessment of Necessity and Proportionality

The Council has considered whether the camera could be repositioned or adjusted to eliminate this incidental capture and has concluded that:

- Monitoring the access point is necessary to fulfil its public safety and asset protection functions
- Repositioning the camera further would materially reduce its effectiveness in monitoring the Council owned land
- The level of intrusion into adjacent land is minimal and proportionate to the legitimate aim pursued.

Safeguards and Mitigation Measures

To ensure compliance with UK GDPR and to minimise any impact on individuals, including children, the Council has implemented the following safeguards:

- Cameras are positioned to prioritise Council owned land
- No audio recording is undertaken
- Access to footage is strictly limited to authorised personnel
- Footage is retained for no longer than 30 days unless required for investigation
- Clear signage is in place informing individuals of CCTV operation

In addition, the Council will:

- Review the camera positioning and field of view periodically

- Consider the use of privacy masking or further adjustment where technically feasible
- Complete a further review prior to any reopening of the permissive gate currently closed during construction works

Conclusion

The Council considers that the operation of the camera remains necessary and proportionate, and that any incidental capture of adjacent land is justified, limited and subject to appropriate safeguards.

This addendum forms part of the Council's ongoing commitment to ensuring that CCTV use remains compliant with data protection legislation and responsive to changing circumstances.

This addendum should be read in conjunction with the PIA adopted January 2025 and reviewed January 2026.