

Old Catton Parish Council

Addendum to CCTV Privacy Impact Assessment (PIA)

February 2026

12. Incidental Capture of Adjacent Land (School Boundary)

The Council has considered 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 support the prevention and detection of crime and anti-social behaviour

The camera is not directed at the school playground and does not monitor it as a primary focus.

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 aims 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 and minimise capture beyond the boundary
- 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
- The Council will give consideration to additional technical measures, such as privacy masking, where this can be implemented without undermining the primary purpose of the camera.

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
- Undertake a further review of the camera positioning and field of view in line with any changes to the use of the permissive gate.

Conclusion

On 9 June 2026 the Council resolved to withdraw the historical permissive pedestrian access between the Recreation Ground and that school, with one month's notice. The Council will review the operation and positioning of the camera once the revised access arrangements have taken effect.

Pending implementation of those arrangements, the Council remains satisfied that the operation of the camera is necessary and proportionate for the purpose of protecting Council property, supporting community safety and assisting in the prevention and detection of crime. Any incidental capture beyond the Council's boundary is minimal, justified and subject to appropriate safeguards.

This addendum forms part of the Council's ongoing commitment to ensuring that its use of CCTV remains compliant with data protection legislation and responsive to changing operational circumstances. The Council will continue to review the necessity, proportionality and field of view of the camera as part of its regular review of the CCTV system.

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