

Portreath Parish Council Bay Data Privacy Impact Assessment

Submitting controller details

Name of controller	Lucy Jose
Subject/title of DPO	Clerk and Responsible Financial Officer
Name of controller contact	Lucy Jose

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.

Portreath Parish Council Parish Council has erected CCTV cameras on and inside the Parish Council office and community hub in Portreath. The cameras are purely for the prevention of crime, more specifically to identify individuals committing acts of theft and vandalism to the building and adjacent toilet block and for staff safety.

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?

Data is stored by way of a continuous stream of video footage and collected on an external driver in the storeroom. Access is password controlled, and access is restricted to the Clerk, assistant to the Clerk and the parish council's security contractor.

There is a monitor in the parish office which supplies a constant feed of the images. The monitor is on the wall visible from the staff desks and not visible from the entrance or the windows of the building.

The full data recording will only be shared with the Police. Other requests for data will be made in accordance with the parish council's CCTV policy.

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?

The data captures images of everyone entering the office and community hub, public toilets, inside of the parish office and those in the close vicinity. This includes members of the public, parish council staff, councillors, contractors commissioned by the parish council as well as those entering the neighbouring business by the kitchen door.

Sound is not recorded.

The cameras run 24/7 and data is automatically deleted after 28 days.

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)?

Individuals are generally members of the public who are not known to the parish council. The exception are those mentioned above.

Children and vulnerable people are likely to be included in the images recorded.

The cameras have been installed as part of the wider office and community hub project. However, the public toilets often are the victim of antisocial behaviour and vandalism, it is anticipated that the installation of the cameras will reduce the instances of vandalism in the public toilets and to the parish office and community hub.

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 cameras are principally there to act as a deterrent as well as to record any crime.

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?

No consultation has taken place.

The type of cameras used are on the advice of a installation company.

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?

Whilst the Parish Office, Community Hub and Public Toilets are in a prominent location this has not deterred vandalism,

There is no other viable option to monitor activities taking place in the vicinity of the building.

There is clear signage outside the building informing of the use of surveillance equipment.

The parish council's telephone number is also displayed.

Use of the cameras is considered proportional to the anticipated outcome.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
Taking images of members of the public	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
	Possible	Minimal	Low

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
Loss of privacy of individuals	<p>Access to data is strictly controlled and both staff and security contractors with access are aware of the need for confidentiality.</p> <p>Sharing data is considered a disciplinary matter.</p>	<p>Eliminated reduced accepted</p> <p>Eliminated</p>	<p>Low medium high</p> <p>Low</p>	Yes/no

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Portreath Parish Council 3 rd February 2025	
This DPIA will kept under review by:	The Clerk will advise the parish council when the DPIA needs reviewing	The DPO should also review ongoing compliance with DPIA