



Edgecote Park CCTV

Data Protection Impact Assessment

July 2024

First review May 2025



Project name: Edgecote Park Caddington CCTV installation

Data controller(s): Caddington Parish Council

This DPIA template should be completed with reference to the guidance provided by the Surveillance Camera Commissioner and the ICO. It will help you to identify whether the use of surveillance cameras is appropriate for the problem you wish to address, assess the risks attached to your project and form a record of your decision making.

1. Identify why your deployment of surveillance cameras requires a DPIA¹:

- | | |
|---|--|
| <input type="checkbox"/> Systematic & extensive profiling | <input type="checkbox"/> Large scale use of sensitive data |
| <input checked="" type="checkbox"/> Public monitoring | <input type="checkbox"/> Innovative technology |
| <input type="checkbox"/> Denial of service | <input type="checkbox"/> Biometrics |
| <input type="checkbox"/> Data matching | <input type="checkbox"/> Invisible processing |
| <input type="checkbox"/> Tracking | <input type="checkbox"/> Targeting children / vulnerable adults |
| <input type="checkbox"/> Risk of harm | <input checked="" type="checkbox"/> Special category / criminal offence data |
| <input type="checkbox"/> Automated decision-making | <input type="checkbox"/> Other (please specify) |

For the prevention and detection of crime.

2. What are the timescales and status of your surveillance camera deployment? Is this a proposal for a new deployment, or the expansion of an existing surveillance camera system? Which data protection regime will you be processing under (i.e. DPA 2018 or the GDPR)?

Proposed installation of 1 CCTV post and 1 x Pan Tilt and Zoom and 2 x fixed dome at Edgecote Avenue Park. Planned installation by 1/9/2024. Processing data under the Data Protection Act 2018. All cameras are approved by the Full Parish Council before installation and Manager by the Parish Private CCTV contractor.

Describe the processing

Edgecote Park is a public open space which is open 24/7/365 it is owned by Caddington Parish Council. The park contains a play area and outdoor gym equipment which are also open 24/7/365. The equipment in the play area is dated and the Parish has resolved to replace the equipment in the Autumn of 2024. There have been reports of ASB (smashing glass bottles and breaking the gym and play equipment) in the park and the Parish Council wishes to protect its new investment so that the equipment can be maintained for all to use. More generally the Parish wishes:

- to reduce the fear of crime by persons using the facilities and so that they can enter and leave the facilities without fear of intimidation by individuals or groups;
- to reduce the vandalism of property and to prevent, deter and detect crime and disorder;
- to assist the police, the Council and other Law Enforcement Agencies with identification, detection, apprehension and prosecution of offenders by examining and using retrievable evidence relating to crime, public order or contravention of bye-laws;
- to deter potential offenders by publicly displaying the existence of CCTV, having cameras clearly sited that are not hidden and signs on display in areas being monitored;
- to assist all “emergency services” to carry out their lawful duties

3. Where do you need to use a surveillance camera system and what are you trying to achieve? Set out the context and purposes of the proposed surveillance cameras or the reasons for expanding an existing system. Provide evidence, where possible, including for example: crime statistics over an appropriate time period; housing and community issues, etc.

¹ <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/>

What the benefits will be to the organisation, to individuals and to other parties:

Although crimes are reported to the police, there are also a large number which go unreported which therefore does not allow the police to follow up and take action. CCTV images will allow action to be taken, without the need to rely on residents.

The need for a DPIA was identified due to following:

It will involve the collection of new information about individuals through visual images. The information will be disclosed to the police in accordance with the law and criminal investigations.

4. Whose personal data will you be processing, and over what area? Set out the nature and scope of the personal data you will be processing Who are the data subjects, and what kind of information will you be collecting about them? Do they include children or vulnerable groups, and what is the scale and duration of the processing?

All groups will be processed including children and vulnerable groups. Images will be recorded onto the stand alone system over a 50 day rolling period before it is deleted.

5. Who will be making decisions about the uses of the system and which other parties are likely to be involved? Will you be the sole user of the data being processed or will you be sharing it with other organisations or agencies? Record any other parties you would disclose the data to, for what purposes, and any relevant data sharing agreements. Note that if you are processing for more than one purpose you may need to conduct separate DPIAs.

Caddington Parish Council CCTV Committee, Bedfordshire Police, CCTV Contractor who will download footage.

6. How is information collected? (tick multiple options if necessary)

- | | |
|---|---|
| <input type="checkbox"/> Fixed CCTV (networked) | <input type="checkbox"/> Body Worn Video |
| <input type="checkbox"/> ANPR | <input type="checkbox"/> Unmanned aerial systems (drones) |
| <input checked="" type="checkbox"/> Stand-alone cameras | <input type="checkbox"/> Redeployable CCTV |
| <input type="checkbox"/> Other (please specify) | |

The cctv system is an enclosed system with no remote access to the internet. The WiFi is very short range and password protected. The recorder is also password protected and so are the individual cameras. The equipment is stored in the cctv post which have two security locks and only authorised key holders have access. The downloaded footage is accessed via a password protected laptop.

7. Set out the information flow, from initial capture to eventual destruction. You may want to insert or attach a diagram. Indicate whether it will include audio data; the form of transmission; the presence of live monitoring or use of watchlists; whether data will be recorded; whether any integrated surveillance technologies such as automatic facial recognition are used; if there is auto deletion after the retention period. You may have additional points to add that affect the assessment.

All CCTV recordings are retained for a minimum period of 50 days. If no legitimate request for retention of the recording has been made, it is then erased or overwritten automatically. All requests for retention of recordings are considered against the provision of the Data Protection Act and the CCTV Code of Practice. Data is stored within secure password controlled router boxes and can only be accessed by authorised individuals.

Recorded data will only be used for the purposes defined in the Code of Practice.

Access to recorded data shall only take place in the circumstances defined in the Code of Practice and the provisions of relevant legislation.

Recorded data will not be sold or used for commercial purposes or the provision of entertainment. Data will only be used for the purposes of prevention and detection of crime and public safety, and where there is a lawful basis / legitimate interest for sharing.

All data released shall remain the property of Caddington Parish Council.

8. Does the system's technology enable recording?

Yes No

If recording is enabled, state where it is undertaken (no need to stipulate address, just Local Authority CCTV Control room or on-site will suffice for stand-alone camera or BWV), and whether it also enables audio recording.

Standalone recording on each camera. No audio is recorded.

9. If data is being disclosed, how will this be done?

- Only by on-site visiting
- Copies of footage released (detail method below, e.g. encrypted digital media, via courier, etc)
- Off-site from remote server
- Other (please specify)

Downloaded footage will be passed to the Police from the Parish Council.

10. How is the information used? (tick multiple options if necessary)

- Monitored in real time to detect and respond to unlawful activities
- Monitored in real time to track suspicious persons/activity
- Compared with reference data of persons of interest through processing of biometric data, such as facial recognition.
- Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software
- Linked to sensor technology
- Used to search for vulnerable persons
- Used to search for wanted persons
- Recorded data disclosed to authorised agencies to support post incident investigation, including law enforcement agencies
- Recorded data disclosed to authorised agencies to provide intelligence
- Other (please specify)

Consultation

11. Record the stakeholders and data subjects you have consulted about the deployment, together with the outcomes of your engagement.

Stakeholder consulted	Consultation method	Views raised	Measures taken
Residents – 13 to 21 and 4 to 8 Edgecote Close (Total of 9 properties)	Hand delivered Letter dated 2 nd March 2024	None	None
Residents – 80 to 98 Elm Avenue (Total of 10 properties)	Hand delivered Letter dated 2 nd March 2024	None	None
Residents – 72 to 92 Manor Road Caddington	Hand delivered Letter dated 2 nd March 2024	1 resident was concerned about privacy, consultation and whether a DPIA had been carried out regarding the original siting of the post behind their property. Residents informed via email and site visit the any private property would be blocked with filters at camera source and so not recorded.	DPIA completed, site meeting held with resident on 7/3/24. Proposed alternative sites discussed. 1 of the alternative site is not suitable due to branches restricting the camera view. 2nd alternative site behind 96 Elm Ave
Monthly Parish Council meetings	Meetings		Review and updated monthly during the installation of the play equipment (September 2024, October 2024)
Annual Parish Council Meeting	Public Agenda Public admitted to meeting		Review and update annually

Consider necessity and proportionality

12. What is your lawful basis for using the surveillance camera system? Explain the rationale for your chosen lawful basis under the relevant data protection legislation. Consider whether you will be processing special categories of data.

The cameras are in place for the prevention and detection of crime. The processing is necessary for the administration of justice

13. How will you inform people that they are under surveillance and ensure that they are provided with relevant information? State what privacy notices will be made available and your approach to making more detailed information available. Consider whether data subjects would reasonably expect to be under surveillance in this context.

Signage under each camera. Privacy notices and Data Protection Policy are available on the Parish Council's website. The Parish Council is also on the ICO register - renewed annually.

The project may interfere with the right to privacy at home/work however the CCTV will not be intentionally pointed towards homes, although images may pick up homes from a distance.

There is a legitimate reason for the potential interference with a qualified right in order to restore public safety and the prevention of crime.

14. How will you ensure that the surveillance is limited to its lawful purposes and the minimum data that is necessary for those purposes? Explain the adequacy and relevance of the data you will be processing and how it is limited to the purposes for which the surveillance camera system will be deployed. How will you know if it is delivering the benefits it has been deployed for?

The data is only used upon request from the police for the purposes of investigating a crime. The Parish Clerk receives all requests and with the contractor obtains the data which is passed directly to the police. The police provide feedback on areas of concern at monthly meetings.

15. How long is data stored? (please state and explain the retention period)

50 days then deleted

16. Retention Procedure

- Data automatically deleted after retention period
- System operator required to initiate deletion
- Under certain circumstances authorised persons may override the retention period, e.g. retained for prosecution agency (please explain your procedure)

Downloaded data is passed to the police (if requested) for them to manage in accordance with their procedures.

17. How will you ensure the security and integrity of the data? How is the data processed in a manner that ensures appropriate security, protection against unauthorised or unlawful processing and against accidental loss, destruction or damage? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

There are no international transfers. The information is transferred to the police using a data stick (encrypted) or via data drop to a secure police email account and website.

18. How will you respond to any subject access requests, the exercise of any other rights of data subjects, complaints or requests for information? Explain how you will provide for relevant data subject rights conferred under the legislation. You must have procedures in place to respond to requests for camera footage in which a subject appears, and to respond to any other request to meet data protection rights and obligations.

A subject access request form will be completed in accordance with the CCTV policy and in accordance with the Council's published complaints policy. The Parish Council has a process which will be followed, to provide relevant requested data be produced accordingly.

The availability of data is time related, so there is a bearing on the timescale of a possible subject request, on the availability of associated data. However as the data is collected for the purposes of prevention and detection of crime, advice will be sought from the DPO at the time with regards to disclosure.

19. What other less intrusive solutions have been considered? You need to consider other options prior to any decision to use surveillance camera systems. For example, could better lighting or improved physical security measures adequately mitigate the risk? Does the camera operation need to be continuous? Where you have considered alternative approaches, provide your reasons for not relying on them and opting to use surveillance cameras as specified.

The park is an open space which allows 24/7 access, the CCTV therefore need to be continuous.

20. Is there a written policy specifying the following? (tick multiple boxes if applicable)

- The agencies that are granted access
- How information is disclosed
- How information is handled

Are these procedures made public? Yes No

Are there auditing mechanisms? Yes No

If so, please specify what is audited and how often (e.g. disclosure, production, accessed, handled, received, stored information)

Policies are reviewed annually. Guidance will be sought from the ICO with regard to requests for data and reviewed and monitored by Caddington Parish Council.

Identify the risks

Identify and evaluate the inherent risks to the rights and freedoms of individuals relating to this surveillance camera system. Consider, for example, how long will recordings be retained? Will they be shared? What are the expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective? Could it interfere with other human rights and freedoms such as those of conscience and religion, expression or association. Is there a risk of function creep? Assess both the likelihood and the severity of any impact on individuals.

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm Remote, possible or probable	Severity of harm Minimal, significant or severe	Overall risk Low, medium or high
View of front of residences in Edgecote Close	Possible	Significant	Medium
View of back gardens of residences in Manor Road	Possible	Significant	Medium
View of members of public accessing area	Remote	Minimal	Low
Viewing footage by unauthorised third party	Remote	Minimal	Low
Data retained longer than required legally (over 50 days)	Probable	Minimal	Low

Address the risks

Explain how the effects of privacy enhancing techniques and other features mitigate the risks you have identified. For example, have you considered earlier deletion of data or data minimisation processes, has consideration been given to the use of technical measures to limit the acquisition of images, such as privacy masking on cameras that overlook residential properties? What security features, safeguards and training will be in place to reduce any risks to data subjects. Make an assessment of residual levels of risk.

Note that APPENDIX ONE allows you to record mitigations and safeguards particular to specific camera locations and functionality.

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk			
Options to reduce or eliminate risk	Effect on risk Eliminated reduced accepted	Residual risk Low medium high	Measure approved? Yes/no
Adjust range of cameras and privacy masking	Eliminated	Low	Yes – telephone chat with ICO
Authorised access only following incident permitted in accordance with the CCTV Code of Practice and the provision of the Data Protection Act 2018	Reduced	Low	Yes

Options to reduce or eliminate risk	Effect on risk Eliminated reduced accepted	Residual risk Low medium high	Measure approved? Yes/no
In every case, a written application in an approved format must be submitted to the Parish Clerk in accordance with the Subject Access Request	Reduced	Low	Yes
Police to ensure validity of evidence and accuracy of data/image for purposes of crime prevention	Accepted	Low	Yes
Ensure technology is adequate and working- include on a monthly maintenance contract.	Reduced	Low	Yes

Authorisation

If you have not been able to mitigate the risk then you will need to submit the DPIA to the ICO for prior consultation. [Further information](#) is on the ICO website.

Item	Name/date	Notes
Measures approved by:	Caddington Parish Council – Full Parish Meeting on 8 th July 2024	Integrate actions back into project plan, with date and responsibility for completion.
Residual risks approved by:	Caddington Parish Council – Full Parish Meeting on 8 th July 2024	If you identify a high risk that you cannot mitigate adequately, you must consult the ICO before starting to capture and process images.
DPO advice provided by:	N/A	DPO should advise on compliance and whether processing can proceed.

DPO advice accepted or overruled by: (specify role/title)		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 be kept under review by: Caddington Parish Council Chair and Clerk - with annual reviews		The DPO should also review ongoing compliance with DPIA.

APPENDIX ONE

Location and scope of surveillance cameras and the steps taken to mitigate risks particular in each location.

Location: Each system operator/owner should list and categorise the different areas covered by surveillance on their system. Examples are provided below.

Location type	Camera types used	Amount	Recording type	Monitoring	Assessment of use of equipment (mitigations or justifications)
Edgecote Park	Stand alone	3	24hrs/7 days per week	Nil	<p>Public access: The privacy level expectation in a public park is very low; There is appropriate signage for CCTV its use and purpose with contact details.</p> <p>Private residents: The privacy level expectation by local private residents is very high both in rooms over looking the park and gardens adjacent. All these residents have been contacted. All areas will be masked at the camera and not recorded. Private residents are able to look at any view of their property in order to be reassured.</p>


APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

Use this risk matrix to determine your score. This will highlight the risk factors associated with each site or functionality.

Matrix Example:

	Camera Types (low number low impact – High number, High Impact)									
										
Location Types A (low impact) Z (high impact)										