# Data Protection Impact Assessment

This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the Criteria for an acceptable DPIA set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

## Submitting controller details

| | |
|---|---|
| Details of Controller | Andy Smith obo Wendover Parish Council |
| | |
| | |

# 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. |
| --- |
| The lone working policy identified risks for staff working at the clock tower on their own, in that they could not see who was at the door or have any reassurance should an incident happen. There was a further issue in that the existing doorbell could not be heard around the clocktower.<br><br>The project was to install a video doorbell and camera pointing at the entry point to the clocktower that can be viewed by staff sat at their desks upstairs whilst lone working.<br><br>This involves cctv surveillance of public areas and the processing of sensitive personal data as the camera captures images of people who use the clock tower |

# 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?

There will be two cameras which are both pointing at the Clock Tower entrance. Because of the nature of doorbell cameras this will also capture sections of Tring Rd and Aylesbury Rd.

The data is stored locally in the unit and is not shared with any other controller or processor. This data is not accessed for any normal day to day purpose.

The images are relayed to two laptops and a work phone using the secured and password protected wifi available at the clock tower. The images can be viewed remotely using a user and password system. This functionality is not envisaged being used other than if a crime or incident is in process.

It is only accessible by the two members of staff who work upstairs in the clock tower. Access to recordings will be only for the prevention or detection of crime and will only be once access has been approved by the Clerk.

**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 collected is CCTV video and audio and because of that this does include special category data.

The type of data being collected will include, height, sex, IC status, distinguishing features, clothing, directions of travel, one camera will capture vehicle registration numbers and vehicle types & colours. The CCTV system cannot discriminate in any way, nor does it have any analytical software which could be used to discriminate people.

The devices are set up as event based recording so when they detect any motion and will collect hold about a month of recordings when it will be automatically written over. The internal camera merely captures the front doors to cover who enters the building or interacts with staff at the door. The doorbell, as previously stated, covers a wider area.

The system is primarily designed for live monitoring by upstairs staff to ensure their safety during lone working.

| **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)? |
| --- |
| The cctv primarily covers staff, volunteers and users of the Clock Tower building. It is envisaged that there will be very little processing of this data other than during lone working to assess the member of staff safety when a visitor knocks on the door or rings the bell.<br><br>There is a CCTV policy in place which allows those individuals to understand their rights. |

| **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? |
| --- |
| As previously discussed this is to allow lone working staff to assess their safety and have a record of any incidents. |

## 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? |
| --- |
| This was a requirement from advice given by a H&S consultancy on protecting office staff who are lone working therefore it was not required to publicly consult. Staff were informed and invited to comment and there was nothing raised from that consultation. |

## 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? |
| --- |
| The lawful basis for holding the data is that this is a vital interest and the CCTV is there for the protection of people who are lone working in the clock tower. The data is predominantly monitored in real time, but only when someone wishes to gain access to the building<br><br>CCTV does support our lone working policy and safety requirements. We have a CCTV policy approved by council that guides any work and stops any mission creep. The purpose of the recording is for the investigation and detection of crime and the prevention and reduction of crime and disorder.<br><br>Any transfer of data is local and a log is made there are no international transfers. All actions go through the clerk. The policy contains a data subject access request form.<br><br>Individuals are informed with notification around the area and the website will have further information. |

# 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** |
|---|---|---|---|
| | Remote, possible or probable | Minimal, significant or severe | Low, medium or high |
| Non Compliance of GDPR/DPA 2018. Non compliance may result in prosecution, financial penalties and severe damage to the reputation of WPC | Possible | Significant | Medium |
| Compliance with articles 6, 8 and 14 of the Human Rights Act. The Act applies to public authorities and other bodies, which may be public or private, when they are carrying out public functions Article 6: the right to a fair trial Article 8: right to a private and family life Article 14: protection from discrimination A breach of any article may impede on the subjects rights and result in the prosecution of the local authority resulting in financial penalties and severe damage to its reputation | Remote | Significant | Low |
| Security of Data. A Security Data breach may result in prosecution under GDPR/DPA 2018 and result in financial penalties and severe damage to the reputation of the local authority | Possible | Significant | Medium |
| Unauthorised Disclosure Unauthorised Disclosure may result in prosecution under GDPR/DPA 2018 and subject to financial penalties and severe damage to the reputation of the local authority | Possible | Significant | Medium |
| Misuse of Data Misuse of data may result in prosecution under GDPR/DPA 2018 and subject to financial penalites and severe damage to the reputation of the local authority | Possible | Significant | Medium |

# Step 6: Identify measures to reduce risk

| Options to reduce or eliminate risk | Effect on risk | Residual risk | Measure approved |
|---|---|---|---|
| | Eliminated reduced accepted | Low medium high | Yes/no |
| Compliance with GDPR/DPA 2018. - Management of the use and security of the system including monitoring and downloading of footage. Regular audits carried out. Clerk has undergone DP training for CCTV systems | Reduced | Low | |
| Compliance with articles 4, 6 and 13 of the Human Rights Act - Management of the use and security of the system including monitoring and downloading of footage. CCTV Log is regularly reviewed by Finance Committee as a part of their audit function | Reduced | Low | |
| Security of Data - Management of the use and security of the system including monitoring and downloading of footage. Regular audits carried out on network system by IT provider. Check of CCTV log | Reduced | Low | |
| Unauthorised Disclosure and Misuse of Data - Release of data is strictly controlled in that no data is released without Council approval under guidance by Clerk. There are only 2 users who can access data, one being the Clerk. | Reduced | Low | |

# Step 7: Sign off and record outcomes

| Item | Name/position/date | Notes |
|---|---|---|
| Measures approved by: | Parish Council 3/12/24 | Integrate actions back into project plan, with date and responsibility for completion |
| Residual risks approved by: | Parish Council 3/12/24 | If accepting any residual high risk, consult the ICO before going ahead |
| DPO advice provided: | n/a | DPO should advise on compliance, step 6 measures and whether processing can proceed |
| Summary of DPO advice:<br>n/a | | |
| DPO advice accepted or overruled by: | n/a | 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: | Parish Council – on an annual basis | The DPO should also review ongoing compliance with DPIA |