Data Protection Impact Assessment (DPIA) – Uffculme Parish Council CCTV System

1. Project Overview
System: Fixed-point CCTV cameras installed across Uffculme Village
Locations:

- Uffculme Skate Park and BMX
- Highland Terrace War Memorial Playgrounds
- Uffculme Bowling Club
- The Square
- Any additional public-interest locations approved by Council

Purpose: To enhance community safety, deter anti-social behaviour, support crime prevention and assist Devon & Cornwall Police in investigations where proportionate and lawful.

Data Controller: Uffculme Parish Council

System Management: Access restricted to the Parish Clerk, with disclosure to the Police, only upon formal written request.

2. Lawful Basis for Processing
Primary lawful basis:
Public Task – Article 6(1)(e) UK GDPR Processing is necessary for the performance of a task carried out in the public interest, namely:

- Crime prevention
- Public safety
- Protection of parish assets
- Supporting law enforcement

Secondary lawful basis (where applicable):
Legitimate Interests – Article 6(1)(f) For the protection of parish property and community wellbeing.

Special category data:
The system is not intended to capture special category data. Any incidental capture is processed under **Article 9(2)(g)** (substantial public interest).

3. Description of the Processing
Data collected:

- Video footage of public spaces
- Images of individuals in those spaces
- Time/date metadata

No audio recording
No facial recognition, behavioural analytics or automated decision-making.

Retention period:

- 30 days, unless footage is required for a police investigation.
- Footage retained longer only under a documented police request.

Access controls:

- The Clerk is the sole authorised operator.
- Access is logged and auditable.
- Police access only via formal written request (email or form).

Storage:

- Encrypted storage on secure parish-owned equipment.
- No cloud transfer unless required for police evidence.

4. Consultation

Internal consultation:

- Parish Council members
- Clerk (system operator)
- Contractor installing CCTV

External consultation:

- Devon & Cornwall Police (crime prevention advice)
- Public notices displayed at all CCTV locations
- Privacy signage installed at each camera site

5. Assessment of Necessity & Proportionality

Necessity:

The parish has experienced:

- Anti-social behaviour in playparks
- Vandalism at the public toilets
- Safety concerns in The Square
- Damage to parish assets

CCTV provides a proportionate and effective deterrent and evidential tool.

Proportionality:

- Cameras are positioned to avoid private homes and non-public areas.
- No intrusive zooming or tracking.
- Only minimal data required for the stated purpose is collected.
- Strict access controls prevent misuse.

6. Risk Assessment

Risk 1: Unauthorised access to footage

Likelihood: Low **Impact:** High

Mitigation:

- Clerk-only access
- Password-protected system
- Encrypted storage
- Access logs retained for audit
- No remote access unless secured via VPN

Risk 2: Excessive or intrusive surveillance
Likelihood: Medium **Impact:** Medium
Mitigation:

- Cameras positioned to avoid private property
- Regular review of camera angles
- Clear signage informing the public
- Annual DPIA review

Risk 3: Data retention beyond lawful period
Likelihood: Low **Impact:** Medium
Mitigation:

- Automated 30-day deletion
- Manual override only when police request evidence
- Clerk responsible for retention compliance

Risk 4: Inappropriate disclosure to third parties
Likelihood: Low **Impact:** High
Mitigation:

- Disclosure only to Police
- Formal written request required
- Clerk logs all disclosures
- No sharing with private individuals or organisations

Risk 5: System failure or data loss
Likelihood: Medium **Impact:** Medium
Mitigation:

- Regular maintenance
- Secure backup of critical system settings
- Contractor support agreement
- Incident reporting procedure in place

Risk 6: Public concern or perception of surveillance
Likelihood: Medium **Impact:** Low
Mitigation:

- Transparent DPIA publication
- Clear signage
- Public explanation of purpose and safeguards
- No audio or advanced analytics

7. Residual Risk
After mitigation, residual risk is assessed as Low to Medium, acceptable for a public-interest CCTV system.

8. Approval & Review
Approved by: Uffculme Parish Council
Operational Lead: Parish Clerk
Review cycle: Annual, or sooner if:

- Camera locations change
- System capabilities change
- New risks emerge
- Police request changes to access arrangements

9. Summary Statement
The CCTV system across Uffculme Village is necessary, proportionate and compliant with UK GDPR and the Data Protection Act 2018. Strict access controls - Clerk only, with Police access on formal request - ensure privacy risks are minimised and community safety benefits are maximised

10. Policy Adoption
This Data Protection Impact Assessment was adopted by Uffculme Parish Council on: 7th September 2026