

Data Protection Impact Assessment

Michaelston y Fedw Community Council

Submitting controller details

Name of controller	Michaelston-y-Fedw Community Council
Subject/title of DPO	Michaelston-y-Fedw CCTV
Name of contact	cctv@michaelston-y-fedw.com

The need for a DPIA

This DPIA is carried out because Michaelston-y-Fedw Community Council operates CCTV at various locations. The system could be said to "systematically monitor a publicly accessible place on a large scale" and so this DPIA is being prepared out of an abundance of caution. None of the other risks outlined in the ICO DPIA checklist are applicable to this system.

The processing

CCTV videos are recorded at a single, secure location. The data is not shared with anyone except for the purposes of law enforcement. No processing is carried out unless an incident needs to be investigated. Videos are deleted automatically within 30 days.

CCTV videos are obtained from cameras overlooking roads, gateways and lay-bys within the council's area. Videos are not filtered, processed or categorised in any way.

The CCTV is not routinely monitored, the content is only accessed when a particular event needs to be investigated.

No individuals are targeted, although the presence of any persons or vehicles within a camera's field of view may be recorded.

Some cameras are equipped with Number Plate Recognition. Vehicle numbers are merely recorded and are not routinely processed.

There are no links to any databases identifying people or vehicles.

Recordings or vehicle numbers may be passed to the Police or other law enforcement agencies on receipt of an official request.

Processing is only carried out in response to an incident needing investigation.

The CCTV system is intended:

- To deter and prevent fly tipping and other criminal activities.
- To assist in the detection and prosecution of offenders.
- To ensure the safety and security of the community.
- To protect the Village Hall and other property and assets.

Consultation process

Stakeholders are:

1. Members of the Community Council, who are fully supportive of the scheme.
2. Owners of land where the cameras are sited, and their immediate neighbours. They are fully supportive, otherwise the cameras could not be located there.
3. Residents of Michaelston-y-Fedw. Residents have frequently asked for the installation and expansion of CCTV to help catch the perpetrators of fly-tipping and other criminal behaviour.

Consultation with security experts is not considered necessary as the videos are only stored at one highly secure location and are only accessible by two nominated individuals.

Necessity and proportionality

Copies of videos may be made available to enforcement agencies on receipt of official requests for assistance.

Copies may be made available to individuals who submit a subject access request in accordance with the council's CCTV Policy.

Videos will not be used for any other purpose.

There are no international transfers.

Identifying and assessing risks

Source of risk and nature of potential impact on individuals.	Likelihood of harm Remote Possible Probable	Severity of harm Minimal Significant Severe	Overall risk Low Medium High
1. Unauthorised access to videos	Remote	Significant	Low
2. Accidental invasion of privacy	Remote	Significant	Low

Identifying measures to reduce risk

Risk	Options to reduce or eliminate risk	Effect on risk Eliminated Reduced Accepted	Residual risk Low Medium High	Measure approved Yes /No
Unauthorised access	Cameras are linked to the data store by point-to-point fibre optics. The data store is in a highly secure data centre. Recorded data is accessible only by named operatives using point-to-point fibre optic links or by pre-authorized access to the data centre.	Reduced	Low	Yes
Accidental invasion of privacy	Cameras are carefully sited to avoid capturing sensitive areas such as neighbouring gardens or windows. The only areas covered are public, where there is no expectation of privacy. No audio is captured.	Eliminated	Low	Yes