

## Data Protection Impact Assessment (DPIA)

### CCTV - Church Lane Car Park

#### 1. Submitting Controller Details

Name of Controller	Bearsted Parish Council
Subject/title of DPO	
Name of controller contact/DPO	Richard Ash / Denis Spooner

#### 2. 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.

Within the Church Lane car park has been a spate of anti-social behaviour involving drug dealing, dangerous driving and threatening behaviour.

Kent Police had been informed but not were not able to visit the site to witness the above behaviour.

The local PCSO advised that evidence would be required to enable them to prosecute any offenders.

The aim is to prevent and reduce anti-social behaviour in and around the Church Lane car park.

Based on the need for evidence of offenders options for CCTV and ANPR were researched to provide to Kent police.

The DPIA would be required for the use of data and storage of data.

#### 3. 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?

Images from the CCTV and ANPR will be stored within a secure i-cloud account.

The i-cloud account will be encrypted and protected by a password only known by Parish Office staff and the Chairman of the Environment Committee. A Data Protection Policy is in place and will be adhered to.

Data will be shared with any individual that submits a request for their personal data.

<p>Should an incident of anti-social behaviour be reported to Bearsted Parish Council recordings will be reviewed and submitted to Kent Police if necessary.</p>
<p><b>Describe the scope of the processing:</b> 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?</p>
<p>The nature of the data is imagery and will be captured by two CCTV and one ANPT camera. The data is stored on the cloud via router near the cameras.</p> <p>The data is captured continuously and will be stored for <b>30 days</b>.</p> <p>The data will be used should there be a report of anti-social behaviour or criminal behaviour. BPC may have an additional use for the data in the future and this will be considered should the matter arise.</p> <p>The area that the CCTV and ANPR cover is the width of the public car park.</p>
<p><b>Describe the context of the processing:</b> 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? <b>Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?</b></p>
<p>Individuals using the public car park do so to visit:</p> <ul style="list-style-type: none"> <li>• Holy Cross Church (service/children's group/choir practice) Visitors to Bearsted Woodland Trust (all ages)</li> <li>• Allotment users</li> <li>• Members of Bearsted and Thurnham Tennis Club (all ages) Members of Bearsted Bowls Club</li> <li>• Members of Girl Guides (all ages) Members of Scouts (all ages) Individuals socializing in the car park</li> <li>• Members of the public walking through the car park for access to public footpaths (all ages)</li> </ul> <p>Those using the car park will not have an option not to be filmed. Signage will be on display explaining the use of the CCTV and ANPR cameras.</p> <p>A public meeting was held to discuss the concerns of residents in the area and they were in favour of CCTV and ANPR. Further comments were sought from residents within the Parish and non were received that were not in favour.</p>
<p><b>Describe the purposes of the processing:</b> 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?</p>
<p>The aim is to prevent and reduce anti-social behaviour in and around the Church Lane car park.</p> <p>Based on the need for evidence of the offender's behaviour Kent Police suggested any evidence gathered could be submitted to them to help bring a prosecution.</p>

Should an incident of anti-social behaviour be reported to Bearsted Parish Council recordings will be reviewed and submitted to Kent Police if necessary.

#### 4. 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?

A public meeting was held to discuss the concerns of residents in the area and they were in favour of CCTV and ANPR. [Bearsted Parish Council Extraordinary Meeting of Full Council Minutes – 2 February 2022.](#) -

Further comments were sought from residents within the Parish and none were received that were not in favour.

Three companies were approached for expert advice; Kronos Threat Management, Brook Security and Saes Solutions. Kronos were successful in their quotation for the contract.

#### 5. 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 Local Government and Rating Act 1997 s31 allows a Parish Council the ability to spend on crime detection and prevention measures in it's area. The lawful basis for collecting the data via CCTV and ANPR is classed as public task and necessary as there is no other safe way to gain evidence of anti- social behaviour.

The processing will be targeted and a proportionate way of achieving BPC's goals purpose.

The data will not be kept longer than necessary (30 days)

BPC has an Model Publication Scheme Policy, IT Acceptable usage and Data Protection Policy which explains to individuals their rights to data and the responsibilities of the council. All policies are regularly reviewed.

Should requests for data come from territories outside the UK an encrypted data sharing service will be used after checking that the individual requires the data being requested.

#### 6. 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 (Remote, possible or probable)	Severity of harm (Minimal, significant or severe)	Overall risk (Low, medium or high)
Data Breach – Should data protocols be breached data could be stolen and used by those unauthorized to do so.	Remote	Significant	Low
Trips and falls – members of the public could walk into signage posts and injure themselves.	Remote	Significant	Low
Electrocution: Members of the public could touch live wires	Remote	Severe	Low

## 7. 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 (Eliminated, reduced or accepted)	Residual risk (Low, medium or high)	Measure approved (Yes/No)
Data Breach – Should data protocols be breached data could be stolen and used by those unauthorized to do so.	All systems are encoded to prevent data from being hacked. Staff trained how to use systems correctly in line with policies.	Reduced	Low	Yes
Trips and falls – members of the public could walk into signage posts and injure themselves.	Signage placed in safest position and lighting provided. Inspection is completed on monthly basis.	Eliminated	Low	Yes
Electrocution: Members of the public could touch live wires	Hardware installed by a competent contractor.  Inspection is completed on a monthly basis	Reduced	Low	Yes

## 8. Sign Off and Record Outcomes

Item	Name/position/date	Notes
Measures approved by:		Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:		If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed

Summary of DPO Advice:

DPO Advice accepted or overruled by:  
If overruled, you must explain reasons.

Comments:

Consultation responses reviewed by:  
If your decision departs from individuals' views, you must explain reasons.

Comments:

This DPIA will be kept under review by:  
The DPO should also review ongoing compliance with DPIA

This policy will be reviewed every two years.