



Data Protection Impact Assessment (DPIA) FOR CCTV in Horsmonden Public Toilets

Project or System:

Installation of CCTV cameras in public toilet communal areas (e.g., washbasin/entrance area only)

Purpose of CCTV Use:

To deter and detect vandalism, antisocial behaviour, and serious criminal activity in the communal areas of the public toilets.

Description of the Processing Activity:

CCTV cameras will record video footage in the communal (non-private) areas.

Cameras will operate 24/7.

Footage will be stored securely on-site and retained for 30 days, unless required for a police investigation.

Only authorised personnel from Horsmonden Parish Council will have access to footage. This personnel will consist of the Parish Clerk and Deputy Clerk.

Legal Basis for Processing:

Legitimate interests under Article 6(1)(f) UK GDPR, with additional safeguards due to the sensitivity of the location.

Assessment of Necessity and Proportionality:

Alternative measures (e.g., patrols, better lighting) were considered but are not feasible or effective in deterring repeat vandalism.

Cameras are positioned to avoid cubicles, urinals, and private areas. Footage is not monitored live unless a serious incident is being investigated.

Risks Identified:

Risk of filming individuals in a private or embarrassing context Potential misuse or unauthorised access to footage

Lack of user awareness about the system

Measures to Reduce Risks:

Clear signage placed at entrances

Restricted camera angles to communal areas only Data access limited to authorised personnel only (the Clerks)

Encryption and secure storage policies in place Regular reviews of system operation and necessity

Stakeholder Consultation:

Internal discussions with site cleaner and parish councillors. No objections raised.

Those using the facility will be adequately informed by signage.

