



# NORTH WALSHAM TOWN COUNCIL

## DATA PROTECTION IMPACT ASSESSMENT (DPIA)

(General Public Data Processing & CCTV Operations)

Adopted by the Council at its meeting held on 24.02.2026

### Introduction

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This Data Protection Impact Assessment (DPIA) sets out how the Town Council identifies, assesses and mitigates risks associated with the processing of personal data relating to the general public and the operation of CCTV within the council office. The DPIA is undertaken in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

The purpose of this DPIA is to ensure that all processing activities are necessary, proportionate and compliant with data protection legislation, and that risks to individuals' rights and freedoms are minimised.

### General Processing of Personal Data

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The Town Council processes personal data to fulfil statutory duties, respond to public enquiries, manage public participation at meetings, maintain official records, and deliver council services.

#### Description of processing:

- Data Subjects: Members of the public, residents, contractors and visitors.
- Categories of Data: Names, addresses, contact details, correspondence, service-related information and audio/video recordings of public meetings.
- Collection Methods: Email, telephone, online forms, written correspondence, in-person interactions, and meeting recordings.
- Storage: Secure council IT systems with controlled access.
- Access: Authorised staff, the Town Clerk and approved contractors under data-processing agreements.
- Retention: In accordance with the Council's Retention Schedule and statutory requirements.

Processing is primarily carried out under Public Task and Legal Obligation. Consent is used only where no other lawful basis applies.

Processing is necessary for the Council to carry out its statutory functions. Data collected is limited to what is required, retained only for appropriate periods and protected through secure systems and procedures.

#### Risks identified:

- Unauthorised access to personal data.
- Accidental disclosure.
- Excessive or unnecessary data collection.
- Inadvertent capture of personal data in meeting recordings.
- Retention beyond statutory or operational requirements.

#### Mitigation Measures:

- Role-based access controls.
- Staff training in data protection.

- Secure email and document-handling procedures.
- Data minimisation practices.
- Clear privacy notices and meeting recording announcements.
- Regular review of retention schedules.

Residual risk is assessed as Low, subject to ongoing monitoring.

## Press Releases CCTV System (Town Council Office)

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The CCTV system is installed to protect staff, visitors, property, deter crime and support the investigation of incidents within the Town Council office.

### Description of processing:

- Location: Inside the Town Council office.
- Recording: Continuous (24/7).
- Data Captured: Video images and audio.
- Data Subjects: Staff, visitors, contractors and members of the public.
- Storage: Secure digital recording system.
- Retention: 60 days, automatically overwritten unless required for an investigation.
- Access: Town Clerk and the police (where appropriate).

Processing is primarily carried out under Public Task and Legal Obligation. Consent is used only where no other lawful basis applies.

Continuous recording is necessary to ensure building security and provide evidence in the event of incidents. Cameras are positioned to avoid unnecessary intrusion. Retention is limited to 60 days, which is proportionate for investigative purposes.

### Risks identified:

- Unauthorised access to CCTV footage.
- Excessive monitoring.
- Retention beyond 60 days.
- Unauthorised disclosure of footage.

### Mitigation Measures:

- Restricted access to authorised personnel only.
- Password-protected system with audit trails.
- Clear signage informing individuals of CCTV use.
- Automatic deletion after 60 days.
- Footage is shared only with law enforcement or where legally required.
- Regular review of camera placement and system performance.

Residual risk is assessed as Low, provided that access controls and retention policies are maintained.

## Consultation, Review and Approval

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The Data Protection Officer (DPO) has been consulted on the processing activities and CCTV operations. Public consultation is not required due to the low-risk nature of the processing, but transparency is maintained through privacy notices and signage.

The DPO considers the processing activities and CCTV system to be compliant with UK GDPR requirements, subject to continued adherence to mitigation measures and periodic review.