



Data Protection Impact Assessment (DPIA) FOR CCTV in Horsmonden Public Toilets Adopted by HPC on 1 December 2025

Project or System:

New installation of CCTV cameras in public toilet communal areas (e.g. washbasin/entrance area only) for public monitoring.

Purpose of CCTV Use:

To deter and detect vandalism, antisocial behaviour, and serious criminal activity in the communal areas of the public toilets. In recent years the toilets have suffered attacks of vandalism and attempted arson as well as other anti-social behaviour

Description of the Processing Activity:

CCTV cameras will record video footage (no audio footage is captured) in the communal (non-private) areas.

Cameras will operate 24/7.

Footage will be recorded and stored securely on-site on a memory card and retained for 30 days, unless required for further investigation.

Footage will only be viewed by authorised personnel following an incident of anti-social behaviour or criminal activity and can be viewed real time if an incident is reported.

Only authorised personnel from Horsmonden Parish Council will have access to footage on a day-to-day basis. These personnel will consist of the Parish Clerk and Deputy Clerk.

Footage will be disclosed to authorised agencies to support post incident investigation including law enforcement agencies.

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:

The Parish Council considered alternative measures (e.g., patrols, better lighting) but these were 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
Automatic overwrite/deletion of data after 30 days storage.

Risk Assessment confirmed:

Horsmonden Parish Council has considered the risks above and believe these are appropriately mitigated by the above measures.

Stakeholder Consultation:

Internal discussions with site cleaner and Parish Councillors and Clerks. No objections raised.
Those using the facility will be adequately informed by signage.

Subject Access requests:

These are covered by the Parish Council's SAR Policy and CCTV Policy

Data Controller:

Horsmonden Parish Council
Contact Lucy Noakes, Clerk Horsmonden Parish Council

DPO Advice Provided:

Data Protection Officer, Richard Newell GDPR Info on 29 May 2025

Review:

This document will be reviewed annually