

Data Protection Impact Assessment - CCTV at Milcombe Play Area, Bloxham Road, Milcombe

Purpose and necessity

The CCTV system supports safety, deters vandalism, and assists with investigating incidents affecting children, families, and parish property. The assessment concluded that CCTV is the least intrusive effective option because the play area has a history of anti-social behaviour and no alternative measures provide equivalent deterrence or evidential value.

Scope of monitoring

Cameras cover only the play area and immediate surroundings. They do not record audio and do not monitor private spaces. The system operates continuously, with footage stored securely for a limited period.

Lawful basis

The lawful basis under UK GDPR is **public task**, as the Council is carrying out a function in the public interest. Footage of identifiable individuals is personal data; footage of children is treated as sensitive and handled with enhanced safeguards.

Risks identified

- Unauthorised access to footage.
- Excessive retention of images.
- Potential intrusion into the privacy of children and families.
- Misuse of footage or inappropriate disclosure.

Mitigation measures

- Access restricted to authorised Council personnel.
- Secure, encrypted storage with access logs.
- Automatic deletion after 28–31 days unless required for an investigation.
- Clear signage and a published privacy notice.
- Annual review of camera placement, purpose, and necessity.
- Safeguarding procedures for any concerns identified in footage.

Outcome

The DPIA concluded that the benefits to safety and crime prevention outweigh the limited privacy impact, provided the safeguards above remain in place and are reviewed regularly.