

Sample DPIA template

This template is an example of how you can record your DPIA process and outcome. It follows the process set out in our DPIA guidance, and should be read alongside that guidance and the [Criteria for an acceptable DPIA](#) set out in European guidelines on DPIAs.

You should start to fill out the template at the start of any major project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes should be integrated back into your project plan.

Submitting controller details

Name of controller	Rodney Stoke Parish Council
Subject/title of DPO	
Name of controller contact /DPO (delete as appropriate)	Helen Marshall

Step 1: 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.

The project is a CCTV camera system at the Rev Cobley Playing Field to record anti social behaviour and criminal damage. All incidents will be handed over to the police.

ICO CCTV guidance advises carrying out an objective assessment of the schemes impact on people's privacy

Step 2: 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?

The CCTV will be sited on the adjacent village hall. Data will be collected and stored on a hard drive in a locked cabinet and will not be connected to Wi-Fi.

The data will be persons entering, using, and leaving the field by the vehicle access, the parking area, the playing field and the playground.

Data will be automatically deleted in 14 days – this will allow for the delayed discovery of damage as the field and playground are checked by a Parish Councillor on a weekly basis.

Or after an incident has been reported and data has been sent to the police.

The data will only be shared with the police or as directed by the police or in response to a request from an individual in accordance with policy.

Describe the scope of the processing: 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?

The data will be members of the public at the Rev Cobley Playing Field 365 days a year.

The data will only be viewed after an incident and will be given to the police.

The Clerk and the designated officer/Councillor will have access to the data.

The data will be destroyed after 14 days

Describe the context of the processing: 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? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The individuals are members of the public. They will have no control over being filmed. They will be notified that they are being filmed. They could be children or vulnerable groups. The system is not novel and we are not aware of any processing or security flaws that have not been addressed by the system policy. It is state of the art technology. We are not aware of any public concerns. The Council has a code of conduct.

Describe the purposes of the processing: 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?

The processing will identify the perpetrators of anti-social behaviour and criminal damage at the playing field. The data will be given to the police if it is considered appropriate by 3 Councillors where possible including the Chairman and Vice Chairman.

This will reduce damage, risk of harm to users of the site and will increase safety and security of the site.

Step 3: 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?

The full Council will approve the policy and system at a Parish Council Meeting. The hall committee, playing field committee and football club were consulted and support the system.

Step 4: 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 lawful basis for processing is public task and the processing achieves the aim of the system. All other avenues have been explored including patrols by the local police. The system will be chosen to fit the purpose and will be carefully positioned. Individuals will be able to request information in accordance with a CCTV policy adopted by the Council. A designated restricted number of persons will be trained to extract the information and the system will only be viewed if there is an incident or request. Information will be downloaded to a hard drive for transfer and will not be emailed unless requested by the police.

Step 5: 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	Severity of harm	Overall risk
<p>Individuals – privacy</p> <p>Corporate</p> <p>Compliance</p>	<p>Remote, possible or probable</p> <p>Remote</p> <p>Remote</p> <p>Possible</p>	<p>Minimal, significant or severe</p> <p>Significant</p> <p>Significant</p> <p>Significant</p>	<p>Low, medium or high</p> <p>Low</p> <p>Low</p> <p>Low</p>

Step 6: 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	Residual risk	Measure approved
Individuals	Delete data regularly – do not hold data where no incident has occurred. Do not connect system to Wi Fi. Do not monitor system.	Eliminated reduced accepted	Low medium high	Yes/no
Corporate	Delete data regularly – do not hold data where no incident has occurred. Do not connect system to Wi Fi. Do not monitor system.	Eliminated	Low	Yes
Compliance	Robust policy in place. Regular reviews.	Eliminated	Low	Yes

Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Rodney Stoke Parish Council 16.9.21	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	n/a	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: Adopt policy and review regularly and after an incident.		
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:		If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will kept under review by:		The DPO should also review ongoing compliance with DPIA