



North Horsham Parish Council

Legitimate Interest Assessment: CCTV on Council Premises (based on the ICO template March 2026)

A legitimate interest assessment written under the retained EU law version of the General Data Protection Regulation ((EU) 2016/679) (the "UK GDPR"), as it forms part of the law of England and Wales, Scotland, and Northern Ireland by virtue of section 3 of the European Union (Withdrawal) Act 2018 and Data Protection Act 2018 for processing of personal data for the purposes of preventing and detecting unlawful acts by means of on premises CCTV.

Part 1: Purpose test

Why do you want to process the data?

For the public benefit through the prevention and detection of crime, to assist with the security of Parish owned buildings for use by visitors and staff

What benefit do you expect to get from the processing?

Increased security of the buildings resulting in enhanced safety for staff and all users of the buildings

Do any third parties benefit from the processing?

Parish staff and all users of the building benefit by the processing of the CCTV data as it assists with the creation of a safe and secure environment through the prevention and detection of unlawful acts or antisocial behaviour.

Are there any wider public benefits to the processing?

The reach of the CCTV is limited to the building interior and the immediate exterior of the front of the building so there is a very limited benefit to the wider public for the detection of unlawful acts immediately outside the premises which assists with the creation of a safe and secure environment for the wider community

How important are the benefits that you have identified?

The identified benefits are vital for the safety of staff and visitors to the Parish Council owned buildings, as well as the general security of the building and the prevention of any theft or damage

What would the impact be if you couldn't go ahead with the processing?

If unable to process the data, the Parish Council would be less able to prevent and detect unlawful acts or antisocial behaviour which would result in a reduction to the safety of staff and visitors to the buildings

Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?

N/A

Are you complying with other relevant laws?

N/A

Are you complying with industry guidelines or codes of practice?

N/A

Are there any other ethical issues with the processing?

No

Part 2: Necessity test

Will this processing actually help you achieve your purpose?

Yes

Is the processing proportionate to that purpose?

Yes

Can you achieve the same purpose without the processing?

No

Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

No

Part 3: Balancing test

Nature of the personal data

Is it special category data or criminal offence data?

There is the potential for special category data to be gathered

Is it data which people are likely to consider particularly 'private'?

The images collected would be visible to anyone in the vicinity of the data subject

Are you processing children's data or data relating to other vulnerable people?

There is the potential for the images of children and vulnerable people to be gathered as visitors to the building

Is the data about people in their personal or professional capacity?

For hirers of the building this will be a personal capacity but for staff and contractors/tradesman in the buildings this would be professional

Reasonable expectations

Do you have an existing relationship with the individual?

For staff and for any tradesman/contractors there is an existing relationship but there is no relationship with hirers of the building and the general public

What's the nature of the relationship and how have you used data in the past?

The relationship with staff and tradesman/contractors is contractual but there has been no use of the data in the past

Did you collect the data directly from the individual? What did you tell them at the time?

The data or images are collected directly from the individual and they are notified of the potential for data gathering by way of notices to the exterior and interior of the building

If you obtained the data from a third party, what did they tell the individuals about reuse by third parties for other purposes and does this cover you?

N/A

How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?

Data or images are constantly collected but as per the CCTV Policy and Code of Practice, is only retained for 30 days. There are no anticipated circumstances that would affect expectations.

Is your intended purpose and method widely understood?

Yes

Are you intending to do anything new or innovative?

No

Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?

No but the use of CCTV is widespread and commonly used

Are there any other factors in the particular circumstances that mean they would or would not expect the processing?

No as the use of CCTV is widespread and commonly used

Likely impact

What are the possible impacts of the processing on people?

For those individuals acting in a lawful manner there is little impact. For anyone who is acting in a criminal way there could be a substantial impact but this is balanced with the positive impact on any victims of crime or antisocial behaviour

Will individuals lose any control over the use of their personal data?

Should the appropriate request be made, footage could be passed to law enforcement or other competent agencies such as the Police with data subject rights restricted in accordance the Schedule 2 (2) of the DPA 2018

What is the likelihood and severity of any potential impact?

For law abiding staff, visitors and users of the hall the likelihood and severity of any potential negative impact is very low. This is alongside the impact on a data subject that is a victim being a benefit due to the gathering of evidence

The likelihood and severity of the impact on anyone undertaking criminal activities would be the result of criminal proceedings

Are some people likely to object to the processing or find it intrusive?

There is the potential for people (staff, visitors and hirers) to object to the processing or find it intrusive but with the signage highlighting the use of CCTV, anyone entering or in the immediate vicinity of the building has the ability to choose not to be a data subject

Would you be happy to explain the processing to individuals?

Yes and explain that this is for the prevention and detection of crime

Can you adopt any safeguards to minimise the impact?

Signage will alert users and those in the immediate vicinity of the building that CCTV is in use, who the data controller is together with the purpose and lawful basis.

A CCTV Policy and Code of Conduct will be regularly reviewed to ensure it stays relevant and up to date

The images will only be retained for 30 days unless the appropriate request is made for retention or transfer to the appropriate law enforcement agency

Can you offer individuals an opt-out?

No

Making the decision

Can you rely on legitimate interests for this processing?	Yes
Do you have any comments to justify your answer? (optional)	
The use of CCTV is widespread and common place, assists in making staff, visitors and hirers of the halls feel safe and can work with law enforcement agencies to prevent and detect crimes	
LIA completed by	Sarah Norman - Clerk to the Council
Date	18.03.26