PRIVACY IMPACT ASSESSMENT & GUIDANCE

Title of activity subject to PIA: **Use of CCTV**

Reference Number: Higher Wiscombe CCTV 10.07.2026

QUESTION	GUIDANCE	RESPONSE
Overview of Activity		
Describe the activity and the reason for implementing it?	Describe the activity and, where possible, provide evidence to support the need for this activity.	Installation of CCTV systems to cover the Courtyard entrance, approach to the house, the entrance to the parking barn and approach to the biomass boiler area. CCTV is needed for safety and security reasons and for the prevention of criminal activities. The installation of CCTV has proven to be a good deterrent for criminals. We have numerous deliveries and many goods are left in the courtyard. We can monitor these deliveries. The Biomass boiler room is full of extremrly valuable plant and machinery, well know for being targeted by thieves. None of the CCTV coverage covers private areas used by the guests. We are in a remote rural location, and CCTV is an excellent deterant.
What does the activity seek to achieve?	Provide details of the intended outcomes of conducting this activity.	To prevent/deter crime, ensure the safety of our guests, employees and visitors and protect our property.
What categories / types of personal data will be processed as a result of this activity?	Names, email addresses, special category data (health / child information).	Images of individuals caught on CCTV may result in the collection of information which reveals an individual's health, race or religion but such collection will be incidental and is not deliberately processed. CCTV footage may collect images of children.
What is the lawful basis for conducting the proposed activity?	Article 6 of the General Data Protection Regulations provides a list of lawful bases for processing personal data.	A legitimate interests assessment has been carried out and is available on the Higher Wiscombe Website page, under CCTV.

Have similar or less intrusive activities been considered or attempted?	Other, less intrusive methods of processing data should be considered or attempted prior to implementing any other activities. e.g. have previously hired security staff	Other methods have been considered including employing a permanent security guard, but this would not be cost effective and would be a risk for a lone worker. CCTV has proven to be an effective deterrent for criminal damage and is sufficient for our needs.
Provide details of the information flows.	What data will be captured as a result of this activity and how is it to be captured?	All images will be captured by camera with an on-site NVR housed in the office in the main house. System has been designed to provide a 30 day loop recording. All recording is local and not sent to a cloud or third party.
Nature and Scope of the Processing		
What is the source of the data / how is it collected?	Direct from the individuals or from another party? Will it be communicated to the individuals?	Images will be collected by the CCTV cameras. Four cameras in total, one by the biomass bolier room, one by the entrance to the courtyard, and one by the front door of the house. Signs will be put up notifying individuals that CCTV is in use.
How will the data be stored?	Will appropriate protection be afforded to the data (given consideration of the type of data)?	Dahua is the manufacturer of all CCTV hardware. The app, main NVR and communication between the cameras and the NVR is all protected by secure passwords. Data can only be viewed if a user has access. Access is only granted by the system owner.
Will this data be shared with any other party?	Any third-party processors etc.	The CCTV system will be operated internally, and recordings will be processed in-house and not processed by a third party security provider. West Country Tech store user data on a secure, password protected server but do not actively view data. If a problem arises and West Country Tech is asked to view/edit footage, an email request is sent to the owner of the system requesting access.

How many individuals will be affected by the processing?	Provide an estimation of numbers of customers and employees affected.	Members of the public have no public access to any of the areas coverd by the cameras. Our guests may be captured on camera as they enter the courtyard or cross the courtyard to get to the various cottages, or to the pool entrance or to the parking batn entrance. Delivery drivers will also be seen by these cameras. We would estimate that around 1,000 persons per annum could have their image captured by this system.
What are the privacy risks of undertaking this activity?	Consider whether the activity and the processing which will occur as a result if it is covered by your Privacy Policy or does it need to be updated to include relevant information – retention times, sharing of data, etc.	We do not regard the insattaltion of these three cameras as intrusive. They are for the benefit of both guests and owners at Higher Wiscombe to protect property, and dot view any of the guests private areas. We do not believe that there is any risk of unauthorised access to the data Individuals will not be able to opt out of this processing given the nature of it – we understand that this may lead to increased requests for erasure.
How will you inform people that you are conducting this activity?	(Where applicable) Signs for CCTV, notices on website etc.	Signs will be erected and our privacy notices for guests will be updated. All staff will be made aware that CCTV is in operation at the premises. We have registered with the ICO.
Management of Risk		
What are the impacts on individuals in carrying out this activity?	Consider any adverse impacts on individuals' rights and freedoms which may come as a result of this activity or the processing, i.e., criminal investigations.	Individuals may be subject to criminal investigations in the event they are carrying out criminal activity, but this is considered proportionate. Do the crime, do the time.

How will the impacts on individuals be mitigated?	(Where applicable) Consider how any of the impacts might be mitigated or avoided.	Recordings captured will be retained for no longer than absolutely necessary – the shortest period of time possible – and will not be disclosed to any third party unless justified under data protection legislation. Data will be deleted automatically after 30 days as per the NVR recording standard. Only public areas will be under surveillance and signs clearly displayed to inform individuals of their presence. Only authorised personnel will have access to the recordings and the recordings will be kept secure. Authorised personnel will receive training on how to use the cameras and footage. The staff have been notified of the prescence of CCTV and the areas that are covered. The website will be updated to include use of CCTV. Individuals requesting access to any of the footage captured by the cameras will be provided with the option to either view the requested footage on site or be provided with a trimmed copy of the footage which shows just the individual making the request. The outside cameras will not cover any public highways.
What technological and organisational measures are in place?	Appropriate technological and organisational measures must be in place to protect against unauthorised/unlawful access to or processing of personal data.	All data is stored on site with the owner. Passwords are in place to access the data. West country Tech have all passwords stored as per the owner's request, but West Country Tech can only access the system with permission from the owner. Data will be deleted automatically after 30 days as per the NVR recording standard.
How often will you conduct a review of this activity to ensure it is still required?	Ensuring periodic reviews will allow you to assess whether your organisation still needs to undertake the activity at a later date or if it is no longer justifiable.	Every 12 months.

1. Outcome

OUTCOME	DECISION DETAIL
FAIL	
PASS	Review completed with help from our Tech Partner who supplied the equipment.
REASONS AND/OR REQUIREMENTS	

Completed by

Name: Alistair Handyside

Role: Director, Higher Wiscombe Limited

Date: 17 July 2026

Signed: