



CHURCH OF IRELAND

Data Privacy Impact Assessment: CCTV

Step One: Identify the need for a DPIA

Explain broadly what the project aims to achieve (e.g. installing and using CCTV) and what type of processing it involves (e.g. collecting, recording, sharing, archiving).

Step Two: Describe the Processing

a. How will you collect, use, store and delete data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing the way personal data flows through the Parish/organization. What types of processing identified as likely high risk are involved?

b. 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??

c. **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)?

d. **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?

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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?

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Step 4: Access 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 minimization? 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?

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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
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high

Step 6: Identify measures to reduce risk – Action Plan				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
		Eliminated reduced accepted	Low medium high	Yes/no

Step 7: Sign off and record outcomes		
Item	Comments	Notes
Actions approved by:	Responsibility for Actions:	
Advice accepted or rejected by:	Comments	
Advice accepted or overruled by:	Comments	
This DPIA will kept under review by:		