

This legitimate interests assessment (LIA) template is designed to help you to decide whether or not the legitimate interests basis is likely to apply to your processing. It should be used alongside our [legitimate interests guidance](#).

Part 1: Purpose test

You need to assess whether there is a legitimate interest behind the processing.

- Why do you want to process the data?
- What benefit do you expect to get from the processing?
- Do any third parties benefit from the processing?
- Are there any wider public benefits to the processing?
- How important are the benefits that you have identified?
- What would the impact be if you couldn't go ahead with the processing?
- Are you complying with any specific data protection rules that apply to your processing (eg profiling requirements, or e-privacy legislation)?
- Are you complying with other relevant laws?
- Are you complying with industry guidelines or codes of practice?
- Are there any other ethical issues with the processing?

Why do you want to process the data?

The CCTV system is intended to help identify vehicles and individuals involved in dangerous driving, anti-social behaviour, criminal damage, and other criminal activity within the village of Princetown. The system provides an evidential record of incidents and supports the prevention and detection of crime.

What benefit do you expect to get from the processing?

The processing will assist in improving community safety, provide reassurance to residents and visitors, deter criminal and anti-social behaviour, and support the investigation of incidents when they occur.

Do any third parties benefit from the processing?

Devon and Cornwall Police may benefit from access to relevant footage where it assists with the investigation of reported incidents or criminal offences. Other authorised agencies may benefit where disclosure is lawful and necessary.

Are there any wider public benefits to the processing?

Yes. The system contributes to the prevention and detection of crime, supports public safety, and may assist in protecting public and community assets from damage or misuse.

How important are the benefits that you have identified?

The benefits are considered significant as they contribute directly to public safety, crime prevention, and the ability to investigate incidents affecting residents, businesses, and visitors.

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

The Parish Council would have reduced ability to support the investigation of incidents occurring within the village, fewer opportunities to deter anti-social behaviour, and limited evidence available to law enforcement agencies following reported incidents.

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

The Parish Council will operate the system in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Surveillance Camera Code of Practice, and guidance issued by the Information Commissioner's Office (ICO). The system will not be used for automated decision-making or profiling.

Are you complying with other relevant laws?

The Parish Council will ensure compliance with all relevant legislation relating to surveillance, privacy, freedom of information, and law enforcement requests for information.

Are you complying with industry guidelines or codes of practice?

The system will be operated in accordance with applicable ICO guidance and the Surveillance Camera Code of Practice, together with any relevant operational procedures adopted by the Council.

Are there any other ethical issues with the processing?

The Council recognises the need to balance public safety with individual privacy rights. The system will be operated in a proportionate and transparent manner, with access restricted to authorised persons and footage retained only for as long as necessary.

Part 2: Necessity test

You need to assess whether the processing is necessary for the purpose you have identified.

- Will this processing actually help you achieve your purpose?
- Is the processing proportionate to that purpose?
- Can you achieve the same purpose without the processing?
- Can you achieve the same purpose by processing less data, or by processing the data in another more obvious or less intrusive way?

Will this processing actually help you achieve your purpose?

Yes. The CCTV system provides a visual record of incidents occurring within the village and may assist in the prevention and detection of crime, anti-social behaviour, criminal damage, and other incidents affecting public safety. It may also provide evidence to support investigations undertaken by Devon and Cornwall Police and other authorised agencies.

Is the processing proportionate to that purpose?

Yes. The system records images in public areas for the purpose of community safety and crime prevention. The Council understands that the system does not include Automatic Number Plate Recognition (ANPR) or Optical Character Recognition (OCR) technology and does not automatically identify or analyse vehicle registration numbers. The processing is therefore limited to standard CCTV recording and is considered proportionate to the legitimate aims being pursued.

Can you achieve the same purpose without the processing?

Alternative measures such as increased reporting by members of the public, improved lighting, signage, and liaison with the police may contribute to crime prevention and public safety. However, these measures would not provide an independent visual record of incidents and would not offer the same evidential value as CCTV footage.

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

The Council has considered whether less intrusive measures could achieve the same objectives. While other measures may support community safety, they would not provide the same ability to review incidents and assist investigations. The Council will minimise data collection by ensuring cameras are directed only at areas necessary for the stated purposes and by operating the system in accordance with its CCTV policy and data protection obligations.

Part 3: Balancing test

You need to consider the impact on individuals' interests and rights and freedoms and assess whether this overrides your legitimate interests.

First, use the [DPIA screening checklist](#). If you hit any of the triggers on that checklist you need to conduct a DPIA instead to assess risks in more detail.

Nature of the personal data

- Is it special category data or criminal offence data?
- Is it data which people are likely to consider particularly 'private'?
- Are you processing children's data or data relating to other vulnerable people?
- Is the data about people in their personal or professional capacity?

Is it special category data or criminal offence data?

The CCTV system does not intentionally collect special category data as defined under UK GDPR, such as health information, religious beliefs, ethnicity, or other sensitive personal information.

The system may incidentally capture images of individuals involved in criminal activity or anti-social behaviour. Where CCTV footage is shared with law enforcement agencies for the investigation of suspected offences, this may constitute the processing of criminal offence data. Any such sharing will only take place where there is a lawful basis and in accordance with relevant data protection requirements.

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

The CCTV system records images within public areas of the village where individuals would not normally have a reasonable expectation of complete privacy. The Council recognises that images of identifiable individuals are personal data and will ensure that recording, access, storage, and disclosure of footage are managed appropriately and proportionately.

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

The system may capture images of children or vulnerable individuals who are present within the areas covered by the cameras. The Council recognises that these groups may require additional consideration and will ensure that footage is handled carefully, accessed only where necessary, and not used for any purpose other than those stated within the CCTV policy.

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

The CCTV system may capture individuals in both personal and professional capacities, including residents, visitors, employees, contractors, and members of the public using the village facilities and public areas. The system does not seek to identify individuals based on their personal or professional status; it records activity within the monitored areas for the purposes of public safety, crime prevention, and incident investigation.

Reasonable expectations

- Do you have an existing relationship with the individual?
- What's the nature of the relationship and how have you used data in the past?
- Did you collect the data directly from the individual? What did you tell them at the time?
- 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?
- How long ago did you collect the data? Are there any changes in technology or context since then that would affect expectations?
- Is your intended purpose and method widely understood?
- Are you intending to do anything new or innovative?
- Do you have any evidence about expectations – eg from market research, focus groups or other forms of consultation?

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

Do you have an existing relationship with the individual?

The Parish Council does not have a direct relationship with every individual whose image may be captured by the CCTV system. The system operates in public areas and may capture residents, visitors, motorists, and other members of the public passing through the village.

The Council does, however, have an established relationship with the local community through ongoing consultation, communication, and engagement regarding the need for CCTV to address dangerous driving, anti-social behaviour, and wider community safety concerns.

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

The Parish Council has historically engaged with residents regarding concerns about dangerous and anti-social driving within Princetown. Personal data collected through CCTV has not previously been used by the Council for monitoring or profiling purposes. Any future use of CCTV footage will be limited to the purposes stated within the CCTV policy, including crime prevention, public safety, and assisting law enforcement agencies where appropriate.

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

No. Images are collected automatically through CCTV cameras positioned in public areas. Individuals are informed of the presence of CCTV through appropriate signage and public information. The Council will provide clear information about the purpose of the CCTV system, how footage is used, retention periods, and individual rights through its CCTV privacy notice.

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?

Not applicable. The Council collects CCTV footage directly through its own surveillance system. Any sharing of footage with third parties, such as Devon and Cornwall Police will only take place where there is a lawful basis and where the disclosure is necessary and proportionate.

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

The proposal for CCTV was developed following concerns raised by residents over a number of years. Consultation began in 2018 following a survey of residents regarding dangerous and anti-social driving. Further engagement took place with residents, Devon and Cornwall Police, West Devon Borough Council, Dartmoor National Park Authority, and the Duchy of Cornwall.

The technology being deployed is standard CCTV recording and does not include ANPR or OCR functionality. The Council will keep the system under review to ensure that the technology remains appropriate and proportionate.

Is your intended purpose and method widely understood?

Yes. The purpose of the CCTV system has been communicated through resident surveys, public meetings, parish council updates, local publications, fundraising activities, and consultation with relevant stakeholders. The intended purpose is to deter dangerous driving and anti-social behaviour, improve public safety, and assist with crime detection.

Are you intending to do anything new or innovative?

No. The Council is implementing a conventional CCTV system for public safety purposes. The system does not use automated recognition technology, profiling, or other innovative surveillance techniques.

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

Yes. Extensive consultation has taken place. In May 2018, the Parish Council surveyed residents regarding dangerous and anti-social driving, receiving over 40 responses. Sixteen respondents specifically identified CCTV as a potential solution.

The proposal was subsequently discussed with Devon and Cornwall Police, West Devon Borough Council, the Office of the Police and Crime Commissioner, Dartmoor National Park Authority, and the Duchy of Cornwall. Feedback from these stakeholders supported the installation of CCTV as a proportionate measure to address community safety concerns.

Further public engagement included a public meeting in September 2019, updates through parish communications, local newspaper articles, and community fundraising events.

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

The Council considers that residents and visitors to Princetown would reasonably expect CCTV to be used in the circumstances identified. The village has experienced longstanding concerns regarding dangerous driving, particularly during adverse weather conditions when vehicles have been reported to be driven dangerously, creating risks to residents, visitors, property, and the wider community.

The CCTV system was developed following consultation with residents and key organisations and is intended to address a specific and identified community safety issue. Clear signage and privacy information will ensure that individuals are aware of the surveillance and how their data is processed.

Likely impact

- What are the possible impacts of the processing on people?
- Will individuals lose any control over the use of their personal data?
- What is the likelihood and severity of any potential impact?
- Are some people likely to object to the processing or find it intrusive?
- Would you be happy to explain the processing to individuals?
- Can you adopt any safeguards to minimise the impact?

What are the possible impacts of the processing on people?

The primary impact is that individuals may be recorded on CCTV while using public areas within Princetown. As images of identifiable individuals are personal data, there is a potential impact on privacy. There is also a risk that individuals may feel uncomfortable being recorded or may perceive CCTV as intrusive. However, the purpose of the processing is limited to improving public safety, preventing and detecting crime, addressing dangerous and anti-social behaviour, and assisting law enforcement agencies where appropriate. The system is not intended to monitor individuals' day-to-day activities or track their movements.

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

Individuals will not have control over whether they are captured incidentally by CCTV while in monitored public areas. However, the Council will maintain appropriate controls over the collection, access, storage, retention, and disclosure of footage.

Individuals will be informed that CCTV is in operation through signage and will have access to information about how their personal data is processed through the Council's CCTV privacy notice.

What is the likelihood and severity of any potential impact?

The likelihood of a negative impact is considered low due to the limited purpose of the system, the restricted access to footage, and the safeguards implemented by the Council.

The potential severity of impact is also considered low, as the system records images in public places only and does not use ANPR, OCR, facial recognition, profiling, or automated decision-making. Any disclosure of footage will be controlled and undertaken only where lawful and necessary.

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

Some individuals may object to being recorded in public areas or may consider CCTV surveillance intrusive. The Council recognises this concern and has sought to balance individual privacy rights with the wider benefits of improved community safety.

The use of CCTV has been subject to consultation with residents and relevant stakeholders, and the stated purpose of the system has been clearly communicated.

Would you be happy to explain the processing to individuals?

Yes. The Council is able and willing to explain the purpose and operation of the CCTV system, including why it has been installed, what information is collected, how footage is used, who may access it, and how long information is retained. The Council will provide this information through appropriate signage, its CCTV policy, and privacy notice.

Can you adopt any safeguards to minimise the impact?

Yes. The Council will implement safeguards including:

- Clearly visible CCTV signage informing individuals that surveillance is taking place.

- Restricting access to recorded footage to authorised personnel only.
- Maintaining secure storage of footage.
- Retaining footage only for as long as necessary.
- Sharing footage only where there is a lawful and justified reason.
- Regularly reviewing camera positioning to ensure only necessary areas are monitored.
- Operating the system in accordance with UK GDPR, the Data Protection Act 2018, ICO guidance, and the Surveillance Camera Code of Practice.

The Council will regularly review the operation of the system to ensure that it remains necessary, proportionate, and appropriately managed.

Can you offer individuals an opt-out?	No
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Making the decision

This is where you use your answers to Parts 1, 2 and 3 to decide whether or not you can apply the legitimate interests basis.

Can you rely on legitimate interests for this processing?	Yes
Do you have any comments to justify your answer? (optional)	
LIA completed by	Abi Horn
Date	6 th August 2026

What's next?

Keep a record of this LIA, and keep it under review.

Do a DPIA if necessary.