**Data privacy impact assessment (DPIA)**

**Data Controller: HDH Wills 1965 Charitable Trust**

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| **Consideration** | **Comments** |
| **Description of the processing and purpose** | Covert video recording is occasionally required to be undertaken by the Ditchley Estate gamekeeper to identify and report trespass and criminal activity. |
| **Assessment of the necessity and proportionality of the processing** | Covert recording is necessary as the purpose would be seriously prejudiced should the individual(s) concerned be informed of such surveillance. |
| **Risks to the rights and freedoms of data subjects** | Individuals may be inadvertently recorded without their knowledge. |
| **Measures taken to address risks** | The Trust has a CCTV policy that outlines the conditions that must be met for covert recording to be authorised. The CCTV policy will be disseminated to residents and staff and will alert individuals to the possibility of covert recording taking place on the Ditchley Estate.  All covert recording must be authorised and documented by Sarah Payne in her position as land agent for the Trust. Prior to being authorised, the use of covert recording must be justified (and measures to mitigate the risk to individuals considered).  Covert cameras shall not be placed in positions that pose an obvious threat to the privacy of residents, staff and other individuals authorised to access the Ditchley Estate. If the recording takes place close to any residential premises on the Estate, the individuals will be informed (wherever practicable).  Recorded footage will be deleted within 7 days if not required to be retained for the prevention/detection of unlawful acts. |
| **Decision** | Considering the mitigation measures in place, it is assessed that the rights of the Trust to detect and report criminal activity over-ride the limited risk to the privacy of individuals authorised to access the Estate. |
| **Date DPIA authorised by Data Controller** |  |