

Hillsborough Scout & Community Hall Group

Data Protection Impact Assessment (DPIA) – CCTV System

This document outlines why CCTV is used, how footage is handled, and how we keep everyone safe.

Author and Owner: Hillsborough Scout & Community Hall Group Ltd

Location: 2A Ballynahinch Road, Hillsborough. BT26 6AR

Review Cycle: Annual or sooner if the system changes

Data Controller: Hillsborough Scout & Community Hall Group Ltd

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1. Purpose of the DPIA

To assess the necessity, proportionality, risks, and safeguards associated with operating CCTV in a community facility used by children, young people, volunteers, and members of the public. The system supports safeguarding, security, and insurance compliance.

2. Description of Processing

- **Nature of processing:** Continuous video recording of internal and external communal areas. No live monitoring except during incidents.
 - **Type of data:** Visual images only.
 - **No** audio recording, biometric processing, facial recognition, or automated profiling.
 - **Data subjects:** Children, parents, volunteers, visitors, hirers, contractors.
 - **System details:** Cameras positioned at entrances, foyer, halls, kitchen (general areas only), meeting room, equipment/cleaner store hallway, car parks, alleys, back garden and external grounds.
 - **No recording** in toilets, changing rooms, private offices, or intimate spaces.
 - **Retention:** Normally **21–30 days**, extended only if needed for investigation, insurance, safeguarding or police/legal requests.
 - **Access:** Restricted to authorised committee members. Password-protected access, encryption, audit logs, and secure deletion/overwrite.
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3. Lawful Basis for Processing³

Article 6(1)(f) – Legitimate Interests

We process CCTV footage to:

- Ensure the safety and security of children, volunteers, and visitors
- Deter and investigate vandalism, trespass, theft or anti-social behaviour
- Comply with safeguarding and insurance requirements
- Provide evidence for incidents, accidents or claims
- Secure the premises when not in use

CCTV is the least intrusive method providing both **deterrence** and **evidential value**, which alternatives (logs, lighting, or alarms) cannot provide.

4. Necessity & Proportionality

- Vulnerable groups use the Hall, including children
- The building cannot be supervised 24/7
- Historical incidents and safeguarding require monitoring of access points and shared spaces
- Cameras avoid private areas
- Audio is **disabled system-wide**
- Clear signage and a published privacy notice provide transparency
- Access is restricted and logged

The system is **proportionate, limited, and targeted** to legitimate objectives.

5. Risks to Individuals

Risk	Likelihood	Impact	Mitigation
Unauthorised access to footage	Medium	High	Encryption, strong passwords, MFA, restricted access, logging
Surveillance of children in activity spaces	Medium	Medium	Cameras only in communal areas; signage; stakeholder consultation
Lack of user awareness	High	Medium	Privacy notices, signage, policy transparency
Excessive retention	Low	Medium	Automated 21–30 day overwrite, documented exceptions
Audio or intrusive monitoring	Low	High	Audio disabled; no cameras in private spaces

Residual risk after mitigation: **Low**

6. Consultation with Stakeholders

- Members of the Scout Group raised concerns about additional cameras and potential data risks. Technical documentation, vendor policies, and security assurances have been provided to address this.
- Newly added cameras in upgraded locations were **temporarily disabled** pending user consultation and agreement on final positioning and purpose.
- Little Explorers staff provided **positive feedback**, welcoming improved external coverage and safeguarding reassurance.

- Trustees, as leaseholders, will continue to be consulted for governance and oversight.
- The Committee is meeting with user groups to confirm camera locations, explain access controls, retention, and legal safeguards.

These steps demonstrate transparency, accountability, and compliance with GDPR's fairness principle.

7. Data Sharing

Not shared routinely.

Footage may be shared with:

- Police or emergency services
- Legal representatives for proceedings
- Insurance providers for legitimate claims

Footage is **never** shared publicly, uploaded to social media, or used for general behaviour monitoring.

8. Security Measures

- Password-protected access
- Multi-factor authentication for administrator accounts
- Encrypted transmission and storage
- Secure cloud access through Hik-Connect
- Firmware and software updates applied promptly
- Access logs maintained

- Secure deletion/overwrite of footage after retention period
- Privacy Notice, CCTV Policy, and LIA published
- Cameras positioned only in justified areas

The system is installed and maintained by **Make I.T. Work (Darian Barr)**.
Documentation and vendor security guidance are held in the compliance pack.

9. Data Subject Rights

Individuals can:

- Request access to footage in which they appear
- Request masking or redaction of third parties
- Ask for restriction or objection to processing (where appropriate)
- Raise a complaint with the **Information Commissioner's Office (ICO)**

Requests handled by the Data Controller.

10. Retention & Deletion

- Footage retained **21–30 days**, then automatically overwritten
 - Longer retention only for investigations, insurance, legal requests or safeguarding
 - Secure deletion applied if systems replaced, or accounts revoked
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11. International Transfers

Hik-Connect may route or store data using secure cloud infrastructure. Where data is processed outside the UK/EU, it must be subject to appropriate legal safeguards (e.g., SCCs, adequacy decisions, encryption, access controls). Vendor compliance documentation is retained by the Committee.

12. Conclusion

The CCTV system is **justified, necessary, and proportionate**.
It:

- supports safeguarding and security
- complies with UK GDPR, DPA 2018 & Surveillance Camera Code of Practice
- minimises intrusion with limited retention, no audio, and no private-space recording
- has strong technical and organisational security controls
- provides clear signage and transparency for users
- includes ongoing stakeholder consultation

Residual risk is **low** after mitigation.
No ICO prior consultation is required.

Approval

Data Controller: Hillsborough Scout & Community Hall Group

Chair: _____ Peter Lonton _____

Signature: _____ Peter Lonton _____

Date: **11 November 2025**

Next Review: 11 November 2026