

CCTV Legitimate Interests Assessment

Hillsborough Scout & Community Hall Group

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 Test – Why CCTV is in Operation

- Protect children, young people, volunteers, visitors, and hirers
- Deter and investigate vandalism, theft, trespass, and unauthorised access
- Provide safeguarding oversight in communal spaces
- Support insurance and risk management requirements
- Assist in incident investigation or safety concerns

No private or intimate spaces are monitored.

Audio is disabled system-wide.

2. Necessity Test

- The building is used by multiple community groups, often involving children and vulnerable individuals
- Activities occur when trustees are not present
- There are multiple access points and outdoor areas that need safeguarding
- Victims of incidents require evidence when reporting safety concerns or crimes

Less intrusive alternatives considered:

Alternative	Why Insufficient
Staff/volunteer supervision	Not possible during off-hours
Alarm-only system	No visibility, no safeguarding coverage, no evidential record
Visitor logs	Do not help with security or safeguarding
Improved lighting	Reduces risk but offers no identification or evidence

3. Balancing Test

The benefits of safeguarding vulnerable groups, protecting assets, and meeting insurance/security requirements outweigh the minimal intrusion of recorded video.

4. Stakeholders Affected

- Children and youth participants
- Adult volunteers
- Community hirers
- Visitors and contractors

5. What Happens With Footage

- Encrypted digital storage
- Automatically overwritten after 21–30 days unless required for investigation
- Access limited to authorised persons
- Shared only with police, insurers, or legal professionals where justified

6. Lawful Basis (UK GDPR & DPA 2018)

- Article 6(1)(f) – Legitimate Interests
- Article 6(1)(d) – Vital Interests

7. Camera Locations & Justification Schedule

External CCTV Camera Schedule

#	Location	Purpose & Justification	Notes / Safeguards
1	Front Door (existing)	Records entry/exit for safeguarding, access control, and incident investigation.	Signage displayed at entrance.
2	Car Park	Deter vandalism, theft, and unauthorised access. Provides evidence for insurance claims, property damage, or accidents.	Covers vehicles and movement; no audio.
3	Car Park 2	Deter vandalism, theft, and unauthorised access. Provides evidence for insurance claims, property damage, or accidents.	Covers vehicles and movement; no audio.
4	Side Alley (Orthoderm side)	High-risk access route used for anti-social behaviour and unauthorised access.	Covers path.
5	Back Garden – wide	Protects rear boundary and outdoor activity space used by youth groups.	Important for safeguarding.
6	Back Porch – fire doors and porch	Protects emergency exits, prevents interference with fire doors, deters unsafe behaviour such as smoking/vaping.	Safety-critical area.
7	Side Alley (second position)	Eliminates blind spots and ensures perimeter coverage. Supports safeguarding in outdoor areas.	Narrow focus; low intrusion.

Internal CCTV Camera Schedule

#	Location	Purpose & Justification	Notes / Safeguards
8	Foyer (existing)	Main access point; records arrivals and departures for safeguarding and incident review.	Signage visible in foyer.
9	Kitchen	Prevents unauthorised access, protects equipment, and supports insurance requirements.	General areas only.
10	Main Hall – Zone 1	Safeguarding in large communal activity area. Deters unsafe behaviour and protects children, users, and property.	No changing areas.
11	Main Hall – Zone 2	Removes blind spots and ensures full visibility and transparency.	Same safeguards as Zone 1.
12	Meeting Room	Protects equipment and users; supports investigations where disputes or safeguarding concerns arise.	Used for small groups and meetings.
13	Equipment Store	Deters theft/misuse of valuable equipment. Provides evidence of access.	Cameras cover the room and doorways.
14	Cleaner Store Hallway	Prevents unauthorised access and protects storage areas and exits.	Low intrusion; short dwell-time area.

8. Conclusion

The use of CCTV at Hillsborough Scout & Community Hall is justified, necessary, and proportionate. The system is installed solely to support safeguarding, security, and lawful operational needs. Cameras operate in communal and exterior spaces only, with no recording in private areas and no audio capture.

The Hall has taken steps to minimise intrusion, including:

- Limiting camera placement to areas where safety concerns reasonably exist
- Using short retention periods
- Restricting access to authorised individuals
- Providing signage and privacy information
- Maintaining secure, encrypted storage
- Sharing footage only when legally required

The legitimate interests of protecting children, volunteers, hall users, and property outweigh the minimal data impact of video-only CCTV in shared spaces. Therefore, the system is compliant with the UK GDPR, the Data Protection Act 2018, and the Surveillance Camera Code of Practice.

The Committee will review the system annually, or sooner if camera locations, technology, or purpose changes.