

Begbroke Village Hall CCTV and Smart Door Lock Policy

Effective Date: 18th June 2025

Review Date: every 12 months thereafter

1. Introduction

Begbroke Village Hall (BVH), a registered charity (Charity No. 304264), operates a Closed Circuit Television (CCTV) system and a smart door lock system to enhance security, safety, and accountability across its premises.

- CCTV Cameras: Strategically positioned to monitor key external areas. Footage is automatically deleted after approximately 30 days unless required for lawful purposes.
- Smart Door Lock: Records individual access codes and timestamps to monitor building entry.

Begbroke Playgroup, as a regular user of the hall, acknowledges and consents to being monitored under this policy.

A Data Protection Impact Assessment (DPIA) has been conducted to evaluate and mitigate privacy risks and ensure compliance with data protection legislation.

This policy complies with:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018 (DPA 2018)
- Information Commissioner's Office (ICO) CCTV Code of Practice
- Surveillance Camera Code of Practice (2021) under the Protection of Freedoms Act 2012

BVH is registered with the Information Commissioner's Office (ICO): Registration Number ZB910144

2. Purpose and Legal Basis

The CCTV and smart door lock systems are used to:

1. Protect the security of BVH premises and assets
2. Deter, detect, and support the investigation of criminal or anti-social behaviour
3. Promote safety for volunteers, staff, hirers, visitors, and contractors

4. Support law enforcement agencies (LEAs) in lawful investigations

Legal Basis:

Processing is based on the legitimate interests of BVH (UK GDPR Article 6(1)(f)), supported by a balancing test documented in the DPIA.

3. Data Protection Impact Assessment (DPIA)

Key DPIA Findings:

Necessity and Justification

- The systems are necessary to safeguard the premises and users.
- Alternatives (e.g., lighting, patrols) were considered but found less effective or impractical.

Privacy Risks and Mitigation

- Private Areas Captured: Mitigated by not placing cameras in private areas (e.g. toilets, changing rooms). Digital masking applied where necessary.
- Excessive Retention: Mitigated by automated deletion of data after 30 days.
- Unauthorised Access: Mitigated through encryption, password protection, access controls, and audit trails.

Transparency and Accountability

- Signage is displayed prominently.
- Data subjects have rights under the UK GDPR, including access and complaint mechanisms.

The DPIA is reviewed annually and following any significant change to systems or law.

4. Compliance with UK Law

BVH ensures adherence to:

- Data Protection Act 2018
- UK GDPR
- ICO CCTV Code of Practice
- Surveillance Camera Code of Practice (2021)

- Principles of lawfulness, fairness, transparency, data minimisation, and purpose limitation
-

5. CCTV Signage

Warning signs are prominently displayed at:

- Main entrance door
- Back and side doors to the hall
- Kitchen door
- Front door of the Playgroup
- Begbroke Bowls Club clubhouse

Each sign clearly states:

- CCTV is in operation
 - The purpose of the system (security and safety)
 - Notification that audio recording is enabled on the video doorbell
-

6. Camera Placement and Coverage

CCTV Cameras

- Front Door (Video Doorbell): Captures the entrance and car park; records video and audio.
- South-East Corner: Covers the east side of the hall, the Bowls Club, and the bowling green.
- South-West Corner: Covers the west side and Playgroup front.
- Rear Cameras (North): Monitor the rear of the hall and Playgroup building.

Smart Door Lock

- Logs individual access codes and timestamps.

Privacy Measures

- No cameras in private or sensitive areas.
- Digital masking used to avoid intrusiveness.
- Playgroup footage recorded during its operating hours may only be accessed in the presence of a Playgroup manager.
- Audio recording is restricted to the video doorbell and used only for security purposes.

7. Monitoring and Access

Access to Data

- Only authorised BVH Management Committee officers may access footage or logs.
- Access to Playgroup-related footage during operational hours requires a Playgroup manager to be present.

Disclosure

- Data is not shared with third parties unless:
 - Required by law (e.g., police request)
 - Explicit consent is provided
- All access and disclosures are recorded in a disclosure log.

8. Data Retention and Security

Retention

- CCTV footage and access logs are retained for up to 30 days unless required for:
 - Ongoing investigations
 - Legal proceedings
 - Subject Access Requests (SARs)

Secure Deletion

- Data is securely erased or anonymised after the retention period.

Security Measures

- Data is stored securely with encryption and restricted access.
- Systems are password protected.
- Regular security audits are conducted.

9. Subject Access Requests (SARs)

Under UK GDPR, individuals can request access to CCTV footage or access logs that include their personal data.

How to Request:

1. Submit a written request to the BVH Data Protection Officer, including relevant date, time, and location.
 2. BVH will respond within one calendar month.
 3. Requests may be declined if they compromise others' privacy or interfere with investigations.
 4. No fee is charged unless the request is excessive or manifestly unfounded.
-

10. Complaints

Complaints regarding the CCTV or smart door lock system should be directed to:

BVH Data Protection Officer (For contact details, please see BVH GDPR policy, available at www.begbrokevillagehall.org)

If unresolved, complaints may be escalated to the Information Commissioner's Office (ICO) at www.ico.org.uk.

11. Policy Review

This policy is reviewed annually or in response to legal or operational changes. A summary is displayed in the BVH lobby.

12. Compliance Checklist

BVH confirms the following:

- ✓ ICO registration and renewal (Reg. No. ZB910144)
- ✓ Prominent signage and purpose statements
- ✓ Cameras positioned to respect privacy
- ✓ Secure storage and limited access
- ✓ Annual system audits and DPIA reviews