

Queens Cross Housing Association

Data Protection Impact Assessment

For guidance on how to complete this form, it is important to read the DPIA Procedure before and during completion of this assessment.

This assessment must be commenced at the beginning of any project involving the use of personal data, or if you are making a significant change to an existing process. The final outcomes must be integrated back into the project plan.

This form should be stored with the DPIA Screening Form.

Name of Organisation	Queens Cross Housing Association
Project Title / Change Description:	CCTV Usage – Westercommon Area v2
Project Manager/ Lead details:	Gillian Harkins, Community Caretaking Service Manager
Name of Data Protection Officer	Trish Knight RGDP LLP
Date of Assessment:	28/06/2024

Step 1: Identify the need for a DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project scoping. Summarise why you identified the need for a DPIA.

(See DPIA Procedure Step 1 for further guidance).

To use CCTV externally and internally for the purposes of health and safety, the prevention and detection of crime and for the safety and security of staff, tenants, and other persons, including visitors to Queens Cross Housing Association premises.

Step 2: Describe the Processing

2a Describe the nature of the processing:

(See DPIA Procedure Step 2 for further guidance)

How will you collect, use, store and delete data? Please answer in the box below

Make and Model of camera:

28 x static entrance camera. Analogue except 8 x lift
 5 x PTZ Cameras.
 6 x Static Multi heads.
 6 x Static internal cameras. Analogue

Servers

2 x servers located in courtyard building

The footage is stored on our own internal server and is deleted continuously every 30 days.

Throughout various sites there are 13 x wireless links at various locations connected to central location at 65 Cedar Street and then linked back to our centralised CCTV hub at 45 Firhill Road.

This room has 8 x 43inch wall monitors, 3 x spot monitors, and 1 x playback monitor and PC for disk burning.

Location of cameras

Westercommon internal and external cameras	
Camera 1	External rear 109 Cams 1, 2, 3.
Camera 2	External front 109 Cams 1,2,3,4.
Camera 3	External corner Ellesmere / wcrd (PTZ)
Camera 4	External corner Ellesmere / 231 Cams 1,2,3.
Camera 5	External side 231 (PTZ)
Camera 6	External rear 231 Cams 1, 2, 3, 4.
Camera 7	External Pan PI / 187 (PTZ)
Camera 8	External Side C/Yard / rear 187 Cams 1, 2, 3.
Camera 9	External rear C/Yard (PTZ)
Camera 10	External wcrd Cams 1, 2, 3.
Camera 11	External front entrance 109
Camera 12	Internal outer foyer 109
Camera 13	Internal inner foyer 109
Camera 14	Internal inner foyer 109
Camera 15	Internal odd lift 109
Camera 16	Internal even lift 109
Camera 17	Internal ground rear stair 109
Camera 18	External front entrance 231
Camera 19	Internal outer foyer 231
Camera 20	Internal inner foyer 231
Camera 21	Internal inner foyer 231
Camera 22	Internal even lift 231
Camera 23	Internal odd lift 231
Camera 24	Internal ground rear stair 231
Camera 25	External front entrance 187
Camera 26	Internal outer foyer 187
Camera 27	Internal inner foyer 187
Camera 28	Internal inner foyer 187
Camera 29	Internal odd lift 187
Camera 30	Internal even lift 187
Camera 31	Internal ground rear stair 187
Camera 32	External front entrance 151
Camera 33	Internal outer foyer 151

Camera 34	Internal inner foyer 151
Camera 35	Internal inner foyer 151
Camera 36	Internal even lift 151
Camera 37	Internal odd lift 151
Camera 38	Internal ground rear stair 151

What is the source of the data? Please answer in the box below

The source of the data is the cameras.

Will you be sharing data with anyone? Please answer in the box below

The data is stored internally and would only be shared with others (e.g. police / investigators / insurance companies / legal advisors) if lawful.

What types of processing identified as likely high risk are involved?

Insert flow diagram showing data flows (optional) Please answer in the box below

Images are not classed as high risk , although it may display ethnicity and health disability information in the capture

2b Describe the scope of the processing:
(See DPIA Procedure Step 2 for further guidance)

Details of personal data
Please indicate what personal data will be collected/stored/processed, please indicate with an X where applicable.

Administration data

Name	<input type="checkbox"/>
Date of Birth/Age	<input type="checkbox"/>
Gender	<input type="checkbox"/>
Contact details	<input type="checkbox"/>
Unique identifier e.g. student number/NI No.	<input type="checkbox"/>
Other data (please specify): Video only	<input checked="" type="checkbox"/>

Special Categories of data

Racial or ethnic origin	<input type="checkbox"/>
Political opinion	<input type="checkbox"/>
Religious or philosophical beliefs	<input type="checkbox"/>
Trade Union membership	<input type="checkbox"/>
Physical or mental health condition	<input type="checkbox"/>
Sexual life and sexual orientation	<input type="checkbox"/>
Genetic data	<input type="checkbox"/>
Biometric data used to identify an individual	<input type="checkbox"/>

Other sensitive information

Financial information/bank account details	<input type="checkbox"/>
Criminal convictions and offences	<input type="checkbox"/>
Other (please specify):	

Under Article 6 of the UK GDPR one or more of the following conditions needs to apply before the processing of personal data is lawful. Please select which condition applies:

6(1)(f) Legitimate Interests - The processing is necessary for the purposes of legitimate interests pursued by the business or another party and does not prejudice the rights and freedoms of the individual (please provide further details below)

If processing Special Category Data, please select which of the conditions for processing applies

N/A

2c Describe the context of the processing:

(See DPIA Procedure Step 2 for further guidance)

What is the nature of your relationship with the individuals? Please answer in the box below

Individuals who will be captured in the CCTV recordings will generally be staff, visitors and contractors attending the location.

How much control will they have? Please answer in the box below

Little control – they will not have the choice whether to appear in the images or not. Signage will be in place to inform CCTV is in operation . They will have the usual rights under UK GDPR in relation to their personal data.

Would they expect you to use their data in this way? Please answer in the box below

People are used to having their images recorded on CCTV. The surveillance camera technology is not facial recognition CCTV.

Individuals entering and outside the premises are advised by signs that we are recording CCTV imagery.

The wording of the signs includes “ this area is monitored by CCTV”

The signs are located visibly in the area – NB a review of this is currently underway

Do they include children or other vulnerable groups? Please answer in the box below

There is no intention to focus on children or vulnerable groups, but the cameras may capture their images if they are at the location.

Are there prior concerns over this type of processing or security flaws? Please answer in the box below

No – CCTV is a widely understood and accepted technology.

Is it novel in any way? Please answer in the box below

No.

What is the current state of technology in this area? Please answer in the box below

In common use.

Are there any current issues of public concern that you should factor in? Please answer in the box below
Facial recognition systems are of public concern, but there is no intention to use this type of technology as part of our CCTV system.
Are you signed up to any approved code of conduct or certification scheme (once any have been approved)? Please answer in the box below
N/A
2d Describe the purposes of the processing: (See DPIA Procedure Step 2 for further guidance)
What do you want to achieve? Please answer in the box below
Health and safety of employees and users of our services, security of our buildings and the detection and prevention of crime.
What is the intended effect on individuals? Please answer in the box below
Health and safety, security and the detection and prevention of crime.
What are the benefits of the processing for you, and more broadly? Please answer in the box below
Health and safety of employees and users of our services, security of our buildings and the detection and prevention of crime.

Step 3: Consultation
Consider how to consult with relevant stakeholders: (See DPIA Procedure Step 3 for further guidance)
Describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Please answer in the box below
It is not deemed appropriate to carry out a consultation as all parties are aware of the requirement. The use of CCTV is covered on our Privacy Notice and there is signage in place advising of the usage, who the Data Controller is and who to contact with any concerns. This is currently under review
Who else do you need to involve within your organisation? Please answer in the box below
Governance team, estates management, DPO, ICT

Do you need to ask any relevant data processors to assist? Please answer in the box below

Yes – for installation and maintenance of the system.

Do you plan to consult information security experts, or any other experts? Please answer in the box below

No.

Step 4: Assess Necessity and Proportionality

Describe compliance and proportionality measures, in particular:

(See DPIA Procedure Step 4 for further guidance)

What is your lawful basis for processing? Please answer in the box below

The lawful basis for the processing is that it is in our legitimate interests, and we have conducted a legitimate interest assessment to that effect.

Does the processing actually achieve your purpose? Please answer in the box below

It is necessary and proportionate to use CCTV recordings for the purposes stated.

Is there another way to achieve the same outcome? Please answer in the box below

It is not financially practicable to employ the services of a security guard.

How will you prevent function creep? Please answer in the box below

Any changes to the system will be controlled via project change processes and if applicable, an update to this DPIA will be done.

How will you ensure data quality and data minimisation? Please answer in the box below

Data is minimised through routine deletion.

What information will you give individuals? Please answer in the box below

Individuals are made aware of the recordings through prominent signage.

How will you help to support their rights? Please answer in the box below

Data subjects can exercise their data subjects' rights in accordance with our privacy notice.

What measures do you take to ensure data processors comply? Please answer in the box below

If contractors providing/maintaining system can access the images, they will be asked to sign a Data Processor Agreement.
How do you safeguard any international transfers? Please answer in the box below
All personal data will be stored in the UK.

Step 5: Identify and Assess Risks

Risk assessment (to be completed by Data Protection Officer in conjunction with project sponsor)

Likelihood of Harm	PROBABLE	Low	High	High	<p>What does ‘harm’ mean?</p> <p>It is something that has an impact on an individual and can affect their circumstances, behaviour, or choices.</p> <p>For example, a significant effect might include something that affects a person’s financial status, health, reputation, access to services or other economic or social opportunities.</p>
	POSSIBLE	Low	Medium	High	
	REMOTE	Low	Low	Low	
		MINIMAL	SIGNIFICANT	SEVERE	
	Severity of Harm				

Describe the source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary. (See DPIA Procedure Step 5 for further guidance)	Likelihood of Harm	Severity of Harm	Overall risk
Risk No. 01 Interference with privacy rights.	Remote	Minimal	Low
Risk No. 02 Lack of security of the personal data.	Possible	Significant	Medium

Step 6: Identify Actions to Mitigate the Risks

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5

(See DPIA Procedure Step 6 for further guidance)

Risk	Actions to reduce or eliminate risk	Effect on Risk <i>(reduced / eliminated / Accepted)</i>	Residual Risk <i>(Low/ Medium/ High)</i>	Action Approved <i>(Yes/No)</i>
Risk No. 01	Prominent signage identifying the data controller	Reduced	Low	Yes
Risk No. 02	Adequate IT and internal procedural measures to ensure no inappropriate disclosure takes place.	Reduced	Low	Yes

Step 7: Approval and Record of outcomes

(See DPIA Procedure Step 7 for further guidance)

Item	Signed / Date	Notes
Risk Actions approved by:	Gillian Harkins , Community caretaking service manager 13.6.24	<i>Integrate actions back into project plan, with date and responsibility for completion</i>
Residual risks approved by:	Gillian Harkins , Community caretaking service manager 13.6.24	<i>If accepting any residual high risk, consult the ICO before going ahead</i>
Consultation responses reviewed by:	Na – internal reviews completed as part of DPIA	<i>If your decision departs from individuals' views, you must explain your reasons</i>

DPO advice provided:	T Knight 4.6.24 & 28.6.24 DPO RGDP LLP	<i>DPO should advise on compliance, step 6 measures and whether processing can proceed</i>
<p>Summary of DPO advice:</p> <p>This is not unusual processing and fully documented .</p> <p>LIA is available on lawful basis for CCTV</p> <p>Updated with feedback from QCHA 28.6.24 this version</p>		
DPO advice accepted or overruled by:	Gillian Harkins , Community caretaking service manager	<i>If overruled, you must explain your reasons</i>
<p>Comments:</p>		
This DPIA will be kept under review by:	Governance team	<i>The DPO should also review ongoing compliance with DPIA</i>