

Data Protection Impact Assessment (CCTV)

Caslon Primary Community School operates a CCTV system. As such, Caslon Primary Community School must consider the privacy implications of such a system. There are a number of other issues Caslon Primary Community School will also need to consider. The completion of the Data Protection Impact Assessment highlights some of the key implications.

A Data Protection Impact Assessment is also recommended by the Surveillance Camera Code of Practice which sets out the guiding principles that should be applied when CCTV systems are in place to ensure that privacy risks are minimised whilst ensuring the aims of the CCTV system are met.

The Data Protection Impact Assessment looks at the wider context of privacy taking into account Data Protection Law and the Human Rights Act. It considers the need for the CCTV system and the impact it may have on individual privacy.

The Data Protection Impact Assessment helps determine whether the proposed system can be justified as proportionate to the needs of the school. In undertaking this Data Protection Impact Assessment Caslon Primary Community School has considered its obligations under Data Protection Law.

Caslon Primary Community School recognizes that changes do occur and on this basis good practice recommends that the school review its Data Protection Impact Assessment. The school recognizes that it is good practice to undertake a Data Protection Impact Assessment before a system is put in place and follows the Surveillance Commissioner's Passport to Compliance.

The school also has a CCTV Policy.

A Data Protection Impact Assessment will typically consist of the following key steps:

1. Identify the need for a DPIA.
2. Describe the information flow.

3. Identify data protection and related risks.
4. Identify data protection solutions to reduce and eliminate the risks.
5. Sign off the outcomes of the DPIA.

Step 1: Identify the need for a DPIA

Explain broadly what 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 proposal. Summarise why you identified the need for a DPIA.

What is the aim of the project? – CCTV consistently delivers benefits in terms of improved health and safety and security within schools. It complements other security measures which are in place within the school.

CCTV aims to achieve the following:

- Improve the health and safety and security of pupils, staff, and visitors
- Protect the school buildings and internal infrastructure
- Improve pupil behavior
- Reduce vandalism
- Provide assistance in the detection and prevention of crime

Parents have the assurance that their children are safe whilst in school. Parents are aware that with CCTV there is the potential for behavior at school to improve. The Board of Governors are also of the opinion that this is the case

Step 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

How will you collect, use, store and delete data? – The CCTV system will provide the school with video pictures from 18 number of fixed based cameras located throughout the school and the images will be captured on a video recorder. The CCTV system is operational 24 hours a day, 7 days a week.

The images are transmitted to a video Digital Video Recorder which are housed within a secure communication room. Access to the communication room is restricted. The images are stored on the hard drive of the Digital Video Recorder.

The transmitted images can also be viewed live in the Server Room. A designated person, i.e. site manager/caretaker and a member of the Senior Leadership Team has access to the CCTV images. This helps to maintain site security, access control, pupil and staff safety.

What is the source of the data? – The CCTV system provides school video pictures, which are transmitted from cameras positioned in various locations throughout the

school. All of the CCTV cameras are fixed on a particular scene. The location of the CCTV cameras are as follows:

- 1 x Key Stage 1 playground
- 1 x Key Stage 1/ Reception garden
- 2 x Nursery Garden, entrance path and bike store
- 1 x Main staff carpark
- 1 x Community entrance
- 1 x School field
- 1 x Rear carpark and top field PTZ camera
- 1 x Key Stage 2 playground
- 1 x Daycare Garden
- 1 x Main Reception inside building
- 1 x Reception Garden
- 1 x Corridor outside Headteacher's office
- 1 x Steps outside hall
- 1 x Area outside Deputy Head's Office
- 1 x Corridor outside Assistant Teacher's Office
- 1 x Corridor outside Year 6, leading up to peace garden
- 1 x Peace Garden / Area behind hall

Will you be sharing data with anyone? – The information is used to ensure the health and safety and security of pupils, staff and visitors. They can be used to detect unauthorized visitors, pupils with poor behavior/internal truancy, and protection of damage to school assets. The information may be shared with Senior Leadership Team and the Police for investigation and enforcement purposes.

Disclosure of data is covered by the school's internal processes which are fully compliant with relevant legislation and Codes of Practice.

What types of processing identified as likely high risk are involved? – Recording of images. Storage of images securely. Appropriate data retention applied to the images.

Data Management controls include passwords to the CCTV system.

Individuals can request copies of CCTV data which contains their personal information by submitting a subject access request.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

What is the nature of the data? – The CCTV data captured is video recordings.

Special Category data? – By default the CCTV may be picking up special category data including race/ethnic origin and the health of an individual

How much data is collected and used and how often? – The CCTV is operational 24 X 7.

How long will you keep the data for? – Images will be retained for 30 days (28 to 30 days best practice) unless requested as part of an incident and then stored on archive for 12 months. The Data Management System automatically deletes the information on the 31st day. Please see the school's Data Retention Policy.

Scope of data obtained? – The CCTV images are obtained within the confines of the school.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

What is the nature of your relationship with the individuals? – The school provides education to its students on a term time basis with staff delivering the National Curriculum. The school may receive a number of visitors on a daily basis including contractors, inspectors, support and agency staff, etc.

How much control will they have? – The school does inform pupils, staff and visitors that CCTV is in use by installing signs detailing the scheme and its purpose, along with a contact telephone number.

The CCTV system is capable of identifying individuals from the system and the images can be used in both criminal and civil court cases.

If a Subject Access Request is made data may be downloaded or copied for release to the data subject or a third party (in the case of a Data Protection request).

Each request for data must be requested via a signed data release form. In the case of the Police this can be authorized by a person at the rank of Sergeant or above using a WA170 form.

Do they include children or other vulnerable groups? – Cameras are located in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected. There are no cameras in toilet areas, changing rooms, and there are no cameras aimed at private areas such as residents' houses, etc.

Are there prior concerns over this type of processing or security flaws? – The school has a CCTV Policy. The system is operated in line with relevant legislation and the Surveillance Camera Code of Practice. Staff operating/using the system have undertaken Data Protection and Information Security training.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The CCTV system is proportionate and justified. It also achieves for the school the following benefits:

1. demonstrates a duty of care to its pupils, staff, and visitors
2. protects the fabric of the school both externally and internally
3. as a consequence of this budgets can be reduced/deferred to other school projects
4. encourages improvement pupil behavior
5. provides assistance in the detection and prevention of crime
6. to assist in managing the school

The CCTV system is referenced in the school's Privacy Notice (Pupil)(Workforce)

Step 3: Consultation process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

The views of students, staff and the Board of Governors will be obtained. Once reviewed the views of stakeholders (including parents) will be taken into account

The view of YourIG has also been engaged to ensure CCTV compliance.

Step 4: Assess necessity and proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimization? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

What is the lawful basis for processing? – The lawful basis for processing is contained in the school's Privacy Notice (Pupil). It includes the following:

- Article 6 and Article 9 (Special Category Data) under Data Protection Law
- The Common Law Duty of Care
- Health and Safety at Work Act
- Safeguarding Vulnerable Groups Act
- Working together to Safeguard Children Guidelines (DfE)

Does the processing achieve your purpose? – Cameras are located in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected.

Is there another way to achieve the same outcome? – To support school security a locked in school policy has been adopted along with improved lighting and other improvements have been put in place.

How will you prevent function creep? – The lawful basis for processing is contained in the school's Privacy Notice (Pupil). Where there have been material changes to the way CCTV is used, the school will undertake a review of its CCTV system to ensure compliance and mitigate against 'function creep.'

How will you ensure data quality and data minimisation? – Consider the source of the data. The school will continue to be compliant with its CCTV Policy.

What information will you give the individuals? – The school does inform pupils, staff and visitors that CCTV is in use by installing signs detailing the scheme and its purpose, along with a contact telephone number.

How will you help them support their rights? – The school has a Subject Access Request procedure in place to ensure compliance with Data Protection Law. CCTV signage states a

contact telephone number. The school will continue to be compliant with its Data Protection Policy.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm	Severity of harm	Overall risk
	Remote, possible or probable	Minimal, significant or severe	Low, medium or high
Positioning of CCTV cameras at entrance points to the school and the issue of privacy	Remote	Minimal	Low
Housing of CCTV cameras outside and ingress of water	Possible	Significant	Medium
Ongoing maintenance of CCTV equipment preventing breakdowns, etc	Possible	Significant Significant	Medium
CCTV policies and procedures not in place leading to inconsistencies, etc	Probable		Medium

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
CCTV & ingress of water	Use of waterproof enclosures	Eliminated reduced accepted Reduced	Low medium high Low	Yes/no Yes
CCTV Maintenance	Hiring of a maintenance company	Reduced	Low	Yes
CCTV Policies & Procedures	Policies and Procedures	Reduced	Medium	Yes

Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:	Governing Board – Caslon Primary Community School	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Governing Board – Caslon Primary Community School	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Yes	DPO should advise on compliance, step 6 measures and whether processing can proceed

<p>Summary of DPO advice: This has been prepared with DPO guidance</p>		
DPO advice accepted or overruled by:	Yes	If overruled, you must explain your reasons
<p>Comments:</p>		
Consultation responses reviewed by:	Governing Board – Caslon Primary Community School	If your decision departs from individuals’ views, you must explain your reasons
<p>Comments:</p>		
This DPIA will kept under review by:	Lynnette Holden-Gough and Amanda Heritage	The DPO should also review ongoing compliance with DPIA