

**Data Protection Impact Assessment (CCTV)**

*As a Christian school our vision is to promote ‘Life in All its Fullness.’ Our ethos is based on our 12 Christian values of hope, honesty, patience, joy, forgiveness, tolerance, thankfulness, respect, kindness, friendship, gentleness and love. It is within the vision and the ethos that this policy is written and will be implemented.*

Date issued: January 2021

Review date: January 2022

Data Protection Impact

Assessment (CCTV)

Holly Hill Church School operates a CCTV system. As such Holly Hill Church School must consider the privacy implications of such a system. There are a number of other issues Holly Hill Church School will also need to consider. The completion of this 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 minimized 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 Holly Hill Church School has considered its obligations under Data Protection Law.

Holly Hill Church 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.

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

**What is the aim of the project?** – CCTV consistently delivers benefits in terms of improved security and safety of the school. 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 behaviour at school to improve.

# Step 2: Describe the information

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| **How will you collect, use, store and delete data?** – The CCTV system will provide the school with video pictures from 9 fixed based cameras located around the school perimeter and the images will be captured on a Digital Video Recorder (DVR) system. The CCTV system is operational 24 hours a day, 7 days a week.  The images are transmitted to a video Digital Video Recorder which is housed within a secure communication / print room. Access to the communication room is restricted to staff and locked out of hours.. The images are stored on the hard drive of the Digital Video Recorder.  The transmitted images can be viewed live in the School Office. 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; |
|  | **Location**  | **Viewpoint of Camera**  | **Sound**  | **Pan/Zoom**  | **Operation Hours**  |  |
| Flat room above kitchen entrance | Car park | No  | No  | 24 hours  |
| Above Willow fire door | Willow side entrance and path down right hand side of school | No  | No  | 24 hours  |
| Corner of meeting room | Main entrance gate to left hand side of school.  | No  | No  | 24 hours  |
| Above Cedar door | Path and left hand side of school | No  | No  | 24 hours  |
| Corner evergreen classroom | Lower playground including trim trail and sports area entrance | No  | No  | 24 hours  |
| Year 1 corner | Lower playground, quiet garden, bus stop shed | No  | No  | 24 hours  |
| Year 1 corner | Upper playground perimeter and banks | No  | No  | 24 hours  |
| Above signing in system in foyer | Foyer and external Main entrance door | No  | No  | 24 hours  |
| Above main entrance door | Pathway into foyer, and main external gate | No  | No  | 24 hours  |

**What is the nature of the data?** – The CCTV data captured is video recordings for the security of the school.

**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

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**How long will you keep the data for?** – Images will be retained for 30 days unless requested as part of an incident and then stored on archive for 12 months. The Data Management System automatically deletes the information after 30 days. Please see the school’s Data Retention and Destruction Policy.

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

**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 on the school railings, 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). Please allow additional time for this as CCSS will need to be involved in the process.

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.

# Step 3: Identify data protection and related risks

**Do they include children or other vulnerable groups?** – Cameras are located outside, in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected. There are no cameras inside the school: toilet areas, classes where children get changed for sports.

**Are there prior concerns over this type of processing or security flaws?** –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 training.

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| The CCTV system is proportionate and justified. It is 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. 6. to assist in managing the school

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Step 3: Consultation process

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| **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.  |

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| **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?** – Additional staff presence before school, after school and during breaks along with improved LED lighting and other improvements have been put in place.   |

#  Step 4: Assess necessity and proportionality , Identify data protection solutions to reduce and eliminate the risks

Step 5: Identify and assess risks

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| **Describe source of risk and nature of potential impact on individuals.** Include associated compliance and corporate risksas necessary.  | **Likelihoo d of harm** Remote, possible or probable | **Severity of harm** Minimal, significant or severe  | **Overall risk** Low, medium or high  |
| * Positioning of CCTV cameras at entrance points to the school and the issue of privacy
* Housing of CCTV cameras outside and ingress of water
* Ongoing maintenance of CCTV equipment preventing breakdowns, etc
* CCTV policies and procedures not in place leading to inconsistencies, etc
* Appropriate CCTV signage in place which conforms to industry standards
* Training not undertaken by those using CCTV
 | Remote  Possible  Possible  Remote  Possible  Possible |  Minimal  Significant  Significant  Significant  Minimal  Significant   |  Low  Low   Medium  High  Low  Medium |

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| **Identify additional measures you could take to reduce 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  CCTV Maintenance  CCTV Policies & Procedures  Training |   Use of waterproof enclosures   Hiring of a maintenance company  Policies and Procedures in situ  Undertaken by office staff to access recordings. CCSS monitor all cameras | reduced  Reduced   Reduced  Reduced | Low medium high  Low   Low  Medium   | Yes    Yes. Use CCSS Yes   Yes  |

# 5.Sign off and outcomes

 measures to reduce risk

Step 7: Sign off and record outcomes

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| **Item**  | **Name/date**  | **Notes**  |
| Document reviewed | **Jo Robinson (DPO)** | December 2020 |
| Summary of DPO advice: In the interests of openness and transparency you may wish to consider placing appropriate information on your website (as part of your publication scheme) that provides parents with information that you might think would be relevant.**Added to website Jan 2021** |
| **This DPIA will kept under review by:**  | **DPO**  | **To be reviewed annually** **Next review date January 2021** |