



CCTV (Controlled Circuit Television Security System)  
Data Protection Impact Assessment (DPIA)

**DPIA in relation to:**

*St Anthony's Catholic Primary School*

**Name and Position of Individual(s) responsible for DPIA:**

*Mr Vincent Dickenson, Site Manager*

*Mr C Flaherty Head Teacher*

*Mrs J Martin Office Manager (DPO)*

**Assessment date:**

*16<sup>th</sup> October 2019*

**Review dates:**

*11<sup>th</sup> June 2020*

## *Reason for Data Protection Impact Assessment (DPIA):-*

*Security cameras installed by SMBC as part of a security initiative. These cameras are used to: -*

- protect pupil safety and security;*
- protect property;*
- deter or reduce the incidence of vandalism, graffiti and other environmental crime; and*
- deter and prevent crime.*

*The benefits of the security system include a reduction in crime and offences, reduction in fear of crime, and improved health and safety for staff, parents, pupils and visitors.*

*CCTV is a proven tool for detecting crimes and protecting people/property. Using CCTV can significantly reduce the time and cost on the police in investigating allegations.*

*CCTV can realistically and consistently deliver these benefits.*

*St Anthony's Catholic Primary School has adopted The Surveillance Camera Code of Practice and Buyers toolkit. Principle 2 of the Code of Practice reflects the data protection obligations set out in data protection law.*

*St Anthony's Catholic Primary School has also adopted the ICO In the picture: A data protection code of practice for surveillance cameras and personal information: the ICO code of practice has been published on the School website – [www.st-anthonys.solihull.sch.uk/policies](http://www.st-anthonys.solihull.sch.uk/policies).*

## **The Nature of the Processing:**

- The system provides on-premises images, which are transmitted from cameras positioned in various locations throughout the premises. The transmissions are received in the School Office. Some cameras are fixed on a particular scene.
- Real-time images that are displayed in the secure School Office environment are presented on the monitor enabling Site Manager, SLT and office staff to monitor incidents.
- The Site Manager has operational access and ability to move the CCTV cameras. Only authorised personnel have full operational access including moving cameras.
- Each camera signal is continuously recorded by way of digital video recorder.
- Images are stored on the hard drive of the digital video recorder (DVR), which is housed within the secure schools' office.
- A digital recording and data management system is in place which covers all data collected by the School surveillance system.
- Access to the School Office is restricted by a window panel and door and by access for scheduled visitors.
- Information is used to monitor pupil safety and security, protect property and prevent and detect crimes. Evidence is provided for investigation and enforcement. Individuals can request copies of CCTV data which contains their personal information. Disclosure of data is covered by internal processes which are fully compliant with relevant legislation and codes of practice.
- Data management control levels and password controls are established on the system. Hardcopy requests for images required.
- Images are retained for 18 days, unless requested as part of an incident and then stored on archive for 12 months.
- The data management system automatically deletes information after 18 days.
- When data is downloaded or copied for release to a third party, the information is recorded on a portable hard drive
- Staff are trained to ensure that data protection responsibilities are understood. Any persons receiving the data must provide signed data release form. In the case of the Police this is authorised by a person at the rank of Sergeant or above. All their responsibilities are set out on the back page of the form which must also be signed. No data is released without both signatures.
- There are currently no precautions are in place to ensure that data will continue to be collected e.g. in the event of a failure of power to cameras and DVR? The Site Manager is discussing with the Head Teacher and Governors as to whether UPS will be installed (UPS - An uninterruptible power supply or uninterruptible power source is an electrical apparatus that provides emergency power to a load when the input power source or mains power fails.)

## Scope of the Processing:

- Images that will be captured include: -
  - Main Reception Door – visitors, parents and pupils arriving/leaving the premises;
  - EYFS Entrance - parents and pupils arriving/leaving the premises;
  - Main Gate Entrance (Fordbridge Road) - visitors and pupils arriving/leaving the premises – including vehicles accessing the premises;
  - Rear Classroom Entrances (Year 2, 3, 4 & Miss Watkin's Office) - parents and pupils arriving/leaving the premises;
  - Playground Images (Camera x 2) - visitors, parents and pupils arriving/leaving the premises & children doing outside activities – PE/play;
  - Rear of Reception & Year 1 Classroom Entrance – Reception - parents and pupils arriving/leaving the premises. Year 1 – Garden access; and
  - Kitchen/Rear Access – bike stands and access to school from rear by deliveries etc. – also some capture of visitors, parents & pupils arriving via the entrance on Oakthorpe Drive via car park.
- Images will be collected from: -
  - Main Reception Door;
  - EYFS Entrance;
  - Main Gate Entrance (Fordbridge Road);
  - Rear Classroom Entrances (Year 2, 3, 4 & Miss Watkin's Office);
  - Playground Images (Camera x 2);
  - Rear of Reception & Year 1 Classroom Entrance; and
  - Kitchen/Rear Access.
- All images captured by the cameras will be used to improve/ monitor pupil safety and security, protect property and prevent and detect crimes.
- The system will be actively recording 24 hours.
- The cameras will be recording images which will be retained for 18 days, unless requested as part of an incident and then stored on archive for 12 months.
- Affected individuals will include pupils, staff, parents and visitors and may include unauthorised persons i.e. prevention and detection of crime.
- The system covers external school premises including the School play area.

## *Context of the Processing:*

- *St Anthony's Catholic Primary School provides education to pupils by employing staff. Parents are free to visit the premises in connection with their child/ren. Visitors such as Local authority representatives, SEN Specialists etc. visit the site and play a role in the provision of pupil education.*
- *Pupils, parents, staff and visitors would not have control in the recording of images; upon valid subject access request, all parties would be able to exercise their rights to view/obtain a copy of recorded images.*
- *There is a general expectation amongst affected individuals that recording will occur. There is signage at each camera location and the Reception sign in area highlighting the use of surveillance cameras.*
- *There are not any known prior concerns over the proposed processing or security flaws or current issues of public concern. The system is not novel in any way.*
- *St Anthony's Catholic Primary School has adopted The Surveillance Camera Code of Practice and Buyers toolkit. The Surveillance Camera Code of Practice has been published on the School website – [www.st-anthonys.solihull.sch.uk/policies](http://www.st-anthonys.solihull.sch.uk/policies) and is approved by the ICO.*
- *St Anthony's Catholic Primary School has also adopted the ICO In the picture: A data protection code of practice for surveillance cameras and personal information: the ICO code of practice has been published on the School website – [www.st-anthonys.solihull.sch.uk/policies](http://www.st-anthonys.solihull.sch.uk/policies).*

## Purposes of the Processing:

- *The surveillance or monitoring system is needed to improve/ monitor pupil safety and security, protect property and prevent and detect crimes.*
- *It seeks to achieve the improvement and monitoring of pupil safety and security, protect the property and prevent and detect crimes.*
- *The proper legal basis for collecting this information is for child protection and public interest.*
- *Images captured by the cameras will be used to improve/ monitor pupil safety and security, protect property and prevent and detect crimes.*
- *Pupils, parents, staff and visitors will benefit from improved safety and reductions in crime.*
- *CCTV is a proven tool in improving security and safety, detecting crimes, and perpetrators of it. Using CCTV can significantly reduce the time and costs on investigating incidents/ allegations. It is known that false allegations are made and CCTV is also useful in disproving some allegations. CCTV captures actual events and is not influenced by interpretation, or events, as seen by people who are under the influence of alcohol or drugs.*

## Consultation:

- *We sought the views of parents and staff; this was sought by way of staff meetings and parent newsletter.*

## Compliance and Proportionality Measures

- *The system has been established on a proper and legal basis and we comply with the Data Protection Act, Human Rights Act and Regulations of Investigatory Powers Act. Regular reviews of camera performance are undertaken to justify their need. The legal bases for processing are legitimate interest and public interest.*
- *We have existing solutions in place, for example security fencing and/ or improved lighting. However, in terms of our aims CCTV is the best solution and works in conjunction with existing measures. We do inform members of the public that CCTV is in use by installing signs detailing the scheme and its purpose, along with a contact telephone number.*
- *The system must be capable of identifying individuals, as footage from the system will be used in both criminal and civil court cases. If the system did not have this capability it would not be fit for purpose.*
- *The system will be delivered/ operated by trained and vetted staff employed directly by the School. We are constantly looking at new technologies and how these will help us to improve on system delivery.*

| <b><i>The Sources of Risk and Nature of Potential Impact on Individuals.</i></b>                                                                                                                                                                                                                                                                                                                             | <b><i>Likelihood of harm Remote, possible or probable</i></b> | <b><i>Severity of harm Minimal, significant or severe</i></b> | <b><i>Overall risk Low, medium or high</i></b> |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------|---------------------------------------------------------------|------------------------------------------------|
| <p><b><i>Collecting/ exceeding purposes of CCTV system</i></b><br/> <b><i>Risk to individuals:</i></b> New surveillance methods may be unjustified intrusion on persons privacy<br/> <b><i>Compliance risk:</i></b><br/> Non-compliance with Data Protection, Human Rights legislation<br/> <b><i>Corporate risk:</i></b> Loss of reputation; Fines and sanctions</p>                                        | Possible                                                      | Minimal                                                       | Low                                            |
| <p><b><i>Retention of images/information for longer than necessary</i></b><br/> <b><i>Risk to individuals:</i></b> Owner retaining personal images/information longer than necessary<br/> <b><i>Compliance risk:</i></b> Non-compliance with Data Protection, Human Rights legislation<br/> <b><i>Corporate risk:</i></b> Loss of reputation; Fines and sanctions</p>                                        | Possible                                                      | Minimal                                                       | Low                                            |
| <p><b><i>Lack of policies and procedures and mechanisms</i></b><br/> <b><i>Risk to individuals</i></b><br/> No public availability of CCTV code of Practice which details how personal data handled, stored, disclosed etc.<br/> <b><i>Compliance risk:</i></b> Non-compliance with Data Protection, Human Rights legislation<br/> <b><i>Corporate risk:</i></b> Loss of reputation; Fines and sanctions</p> | Remote                                                        | Minimal                                                       | Low                                            |
| <p><b><i>Lack of signage</i></b><br/> <b><i>Risk to individuals:</i></b> Public not made aware that they are entering an area monitored by surveillance system<br/> <b><i>Compliance risk:</i></b> Non-compliance with Data Protection, Human Rights legislation<br/> <b><i>Corporate risk:</i></b> Loss of reputation; Fines and sanctions</p>                                                              | Remote                                                        | Minimal                                                       | Low                                            |

**Additional Measures Take to Reduce or Eliminate Risks Identified as Medium or High Risk**

| <b>Risk</b>                                              | <b>Options to Reduce or Eliminate Risk</b>                                                                                                                                                             | <b>Effect on risk</b> | <b>Residual risk</b> | <b>Measure approved</b> |
|----------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------|----------------------|-------------------------|
| <b>Collection of images/information exceeds purposes</b> | Restrict collection of Images/information to identified purposes and locations. Implement appropriate technological security measures and document                                                     | Reduced               | Low                  | Yes                     |
| <b>Retention of images/information</b>                   | Introduce retention periods to only keep information for as long as necessary. These are specified in the publicly available CCTV Codes of Practice/ retention policy                                  | Reduced               | Low                  | Yes                     |
| <b>Lack of policies and procedures and mechanisms</b>    | Produce policies for handling, storage, disclosure of images/information and make them publicly available in the CCTV Codes of Practice/ School Data Protection Policy                                 | Eliminated            | Low                  | Yes                     |
| <b>Lack of signage</b>                                   | Analyse area covered by CCTV system to ascertain if there is prominently placed signage at the entrance to the area monitored and also within that area. All signs to be mapped and audited regularly. | Reduced               | Low                  | Yes                     |

| <b>Item</b>                             | <b>Name</b>                                                      | <b>Date</b>           |
|-----------------------------------------|------------------------------------------------------------------|-----------------------|
| Measures approved by:                   | Head Teacher & Board of Governors                                | <b>October 2019</b>   |
| Residual risks approved by:             | Head Teacher & Board of Governors                                | <b>October 2019</b>   |
| DPO advice provided:                    | The School DPO Service (Warwickshire Legal Services)             | <b>April 2019</b>     |
| DPO advice accepted by:                 | Head Teacher & Board of Governors                                | <b>April 2019</b>     |
| Consultation responses reviewed by:     | Head Teacher & Board of Governors                                | <b>September 2019</b> |
| This DPIA will be kept under review by: | Mr Vincent Dickenson, Site Manager<br>Mr C Flaherty Head Teacher | <b>Ongoing</b>        |

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|--|------------------------------------------|--|
|  | <i>Mrs J Martin Office Manager (DPO)</i> |  |
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