

Data Protection Impact Assessment (CCTV)

Hagley Catholic High School operates a CCTV system. As such Hagley Catholic High School must consider the privacy implications of such a system. There are a number of other issues Hagley Catholic High 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 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 Hagley Catholic High School has considered its obligations under Data Protection Law.

Hagley Catholic High 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

What is the aim of the project? – CCTV consistently delivers benefits in terms of improved health and safety and security. 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 Academy Committee are also of the opinion that this is the case.

Step 2: Describe the processing

How will you collect, use, store and delete data? – The CCTV system will provide the school with video pictures from 16 fixed based cameras located throughout the school 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 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 be viewed live in the reception or a designated person, i.e. a member of the Senior Leadership Team/Operations team. 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
Security Hut	Main Entrance Car Focus	No	No	24 hours
Security Hut	Car Park Entrance facing Music Block	No	No	24 hours
Security Hut	Pedestrian Entrance pathway	No	No	24 hours
Music Block	Main Car Entrance Gate	No	No	24 hours
Music Block	Main footpath facing A-Block	No	No	24 hours
Site Hut	Down Car park	No	No	24 hours
A Block (Front)	A-Block Car Park	No	No	24 hours
A Block (Foyer)	A-Block Entrance	No	No	24 hours
A Block (Boiler House)	A-Block Path to station	No	No	24 hours
A Block (Front)	A-Block Carpark Close	No	No	24 hours
A-Block (Side Sports Hall)	A-Block Side (Sports Hall)	No	No	24 hours

A-Block (Back Entrance)	A-Block Back Entrance	No	No	24 hours
Main Server Room	Main Server Room	No	No	24 hours
A Block Comms Room	A Block Comms Room	No	No	24 hours
Music	Main Pedestrian Gate	No	No	24 hours
Music	Bus Lane	No	No	24 hours

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.

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 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 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 training.

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

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 (School DPO) has also been engaged to ensure CCTV compliance.

Step 4: Assess necessity and proportionality

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 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	Medium
CCTV policies and procedures not in place leading to inconsistencies, etc	Probable	Significant	High
Appropriate CCTV signage in place which conforms to industry standards	Possible	Minimal	Low
Training not undertaken by those using CCTV	Possible	Significant	Medium
Noncompliance when upgrading the school's CCTV system	Possible	Significant	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
		Eliminated reduced accepted	Low medium high	Yes/no
CCTV & ingress of water	Use of waterproof enclosures	Reduced	Low	Yes
CCTV Maintenance	Hiring of a maintenance company	Reduced	Low	Yes
CCTV Policies & Procedures	Policies and Procedures in situ	Reduced	Medium	Yes
Training	Undertaken in GDPR and Information Security	Reduced	Low	Yes
Privacy Notices	Update Privacy Notices to include reference to CCTV	Reduced	Low	Yes
CCTV Passport to Compliance	Use guidance from this document	Reduced	Low	Yes

Step 7: Sign off and record outcomes

Item	Name/date	Notes
Measures approved by:	Amanda Hodder (CFO) / Dean Jones (ICT) and YourIG (DPO)	October 2020
Residual risks approved by:	Amanda Hodder (CFO) / Dean Jones (ICT) and YourIG (DPO)	October 2020
DPO advice provided:	YourIG (DPO)	September 2020
<p>Summary of DPO advice:</p> <p>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.</p>		
DPO advice accepted or overruled by:	Amanda Hodder (CFO) / Dean Jones (ICT)	September 2020
<p>Comments:</p> <p>Relevant documentation as suggested by the DPO can be found on the school website under the Key Information menu</p>		
Consultation responses will be reviewed by:	Tracey Brown (Hagley Catholic High School Business Manager)	Principal will also be informed of the responses along with the Chief Finance Operating Officer of the Academy
<p>Comments:</p>		
This DPIA will kept under review by:	Amanda Hodder (CFO) / Dean Jones (ICT) and YourIG (DPO)	To be reviewed annually