

CCTV PRIVACY IMPACT ASSESSMENT MAY 2023

1 Who will be captured on CCTV?

Pupils, staff, parents / carers, volunteers, Governors, contractors and other visitors including members of the public.

2 What personal data will be processed?

Facial Images and behaviour
(NB no audio recordings will be made)

3 What are the purposes for operating the CCTV system?

- To support the school in maintaining a safe, secure and non threatening environment for pupils, staff and visitors.
 - To prevent the loss or damage to the building / assets of the academy.
 - To assist in the prevention or detection of crime.
- Given the size of the academy site, the large number of people attending the site and the lengthy time periods when the site is unoccupied, CCTV is considered the best solution to achieving these aims.

4 What is the lawful basis for operating the CCTV system?

Public Task (safe and effective running of the school including prevention and investigation of crime)
Legal Obligation (Health & Safety)
Legitimate Interests (prevention of loss/damage and prevention and investigation of crime outside normal school hours)

5 Who is/are the named person(s) responsible for the operation of the system?

Ms A Briffa (SBM)
Mr A Prindiville (Headteacher)
Mrs M Moran (Head of School)
Miss S McCarthy (Deputy Headteacher)
Mr A Hogan (Associate Deputy Headteacher)

6 Describe the CCTV system, including:

- a. how this has been chosen to ensure that clear images are produced so that the images can be used for the purpose for which they are obtained;
- b. siting of the cameras and why such locations were chosen;
- c. how cameras have been sited to avoid capturing images which are not necessary for the purposes of the CCTV system;
- d. where signs notifying individuals that CCTV is in operation are located and why those locations were chosen; and
- e. whether the system enables third party data to be redacted, for example via blurring of details of third party individuals.

a/b) The CCTV system has 32 cameras and covers vulnerable, isolated locations based on: staff knowledge, traffic movement in car park, access to reception, locations where students congregate and areas requiring supervision.
 c) Cameras only cover vulnerable areas and are positioned to avoid areas that do not require CCTV coverage.
 d) Signs are located in reception, on the main entrance door and perimeter gates to maximise public awareness.
 e) Redaction is not possible.

7 Set out the details of any sharing with third parties, including processors

- The Academy will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

8 Set out the retention period of any recordings, including why those periods have been chosen

28 days

This period has been chosen due to the length of the various holiday periods when the school is closed.

- 9 Set out the security measures in place to ensure that recordings are captured and stored securely

- CCTV recording systems are located in restricted access areas.
- The CCTV system does not require encryption as it is not web based and is used for school internal access/use only. All recordings are password protected.
- Restriction of the ability to make copies is restricted to a (DBS enhanced) engineer

- 10 What are the risks to the rights and freedoms of individuals who may be captured on the CCTV recordings?

- Images are recorded without the knowledge of data subjects
- Excessive volumes of data are processed
- Unlawful/unauthorised access to data in system
- System is subject to cyber security incident
- Recorded data is disclosed during transfer to third parties (eg police)

- 11 What measures are in place to address the risks identified?

- Notices are widely and prominently displayed with reference to more detailed privacy information
- Recordings automatically delete every 28 days.
- The system is password protected and located in a locked office.
- The system is not web based and is password protected.
- Recordings are hand delivered to the police on an encrypted, password protected memory stick only following the Headteacher's consent.

- 12 Have parents and pupils where appropriate been consulted as to the use of the CCTV system? If so, what views were expressed and how have these been accounted for?

Yes via the Parents Forum and School Parliament.
The unanimous view of both groups (recorded in the minutes of the meetings) was that the use of CCTV cameras was critical in enabling the academy to maintain a safe and secure environment for the whole community and those visiting the academy.

- 13 When will this privacy impact assessment be reviewed?

Bi-annually

Approval:

This assessment was approved by the Data Protection Officer:

DPO ...M Lantos.....

Mr M Lantos

Date 2nd May 2023

