

# CCTV Privacy Impact Assessment for

## Broad Chalke Primary School

<b>Name of members of staff responsible for the system</b>	Mrs Amanda Brockway	Mrs Andi Chalk
<b>Position</b>	Headteacher	School Business Manager

<b>Name of person carrying out the assessment</b>	Mrs Andi Chalk
<b>Position</b>	School Business Manager

<b>Assessment Date</b>	21 November 2017
<b>Review Date</b>	Autumn Term 2020

### **Description of the CCTV system**

*Include here roughly where the cameras & capturing devices are to be located on the school site, how they will work, where the main system is intended to be stored, what times the system will be active (e.g. 24hr or specific time periods), etc.*

#### **NB. assessment based on new installation.**

- The hard drive recorder and viewing screen are based in the server room. Access is limited to authorised adults only and the room can be locked. (NB. Only the Headteacher, Business Manager and Wessex Fire and Security have access rights to equipment).
- Images from the camera equipment can be viewed 'live' at all times (by authorised controllers). Recorded images are stored on the hard drive for no longer than 14 days before being automatically overwritten with new data images.
- The system is in operation 24 hours per day 365 days a year.
- There are 2 cameras on site. Cameras are located at the following positions:-
  1. External, camera fixed to front elevation of staff block. Positioned to part view the staff / visitor car park, part view pavement in front of school including gateway and path leading up to main reception front door.
  2. External, camera fixed to front elevation of staff block. Positioned to part view the visitor car park, bottom visitor car park, school driveway / path, bicycle rack and part view pavement in front of school including gateway by school playing field.
- Both cameras are in a 'fixed' position.
- The system does not have sound recording capability

### **Purposes of the CCTV system**

*Include here why a CCTV system is needed at the school, what it seeks to achieve, etc.*

- Broad Chalke Primary School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to school property.

### **Other possible solutions**

*Include here what other options are available for achieving the same purposes, e.g. would better fencing make the site more secure*

- Other additional measures are in use to improve security and safety: external perimeter fencing, key pad door entry system, security alarm etc.
- Such measures have not, in the schools opinion, removed the need for CCTV as an additional precaution to address the schools concerns and needs.
- Security and safety of the schools community, buildings and facilities is paramount and is always under review.

### **Advantages of the CCTV system**

*Include here what the advantages of the CCTV system are over the other solutions listed above*

- The main advantage is the retrospective investigation of issues and incidents. This enables the school to maintain sound management of the schools buildings and facilities in order to provide a safe and secure environment for its pupils, staff and visitors and further assist any local authorities, Police, HSE etc. with any associated investigations following any issues or incidents.

### **Images to be captured**

*Explain here who will be included in the images e.g. parents, children, members of staff, other members of the public, etc.*

- Any user or visitor to the main school site could be captured on the CCTV system, this could include; pupils, parents, staff, visitors, contractors etc.
- The system covers an area of public playing field in front of the school, there is a possibility of capturing images of members of the public who do not enter the school grounds.

### **Personnel with access to the system**

*List all staff members who will have authority to access the system as part of their job and why*

- Mrs Amanda Brockway, Head Teacher and School 'Data Controller'.
- Mrs Andi Chalk, School Business Manager and 'CCTV System Manager'.
- Wessex Fire and Security, annual service contract for CCTV.

### **When and how the images will be accessed**

*Include the circumstances in which the images will be accessed, how those images will be used, how that access will be recorded for audit purposes, etc.*

- Images will be accessed if there is a need to retrospectively investigate an incident or, on occasion, 'live' to witness any such incident as it takes place where there may be a danger to personal investigation or other such appropriate reason.
- Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act. All requests should be made in writing to the Headteacher. All requests will be recorded on a register.
- There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators). Requests should be made in writing to the Headteacher. All requests will be recorded on a register.
- The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.
- Images will only be accessed by those authorised to do so. Viewing of recorded images will take place in a restricted area
- Access to recorded data requires individual logins and is password protected.
- Where data retention is needed beyond 14 days, CCTV footage can be copied to external USB memory storage. Recorded data will not be retained for longer than is necessary. All retained data will be properly indexed, recorded on a register and stored securely.

### **Ways in which people are made aware of the CCTV system**

*Include here details of any signage proposed, what the signs will say, where they are to be located, whether the school has a CCTV policy, letters to parents that notify, etc.*

- CCTV warning signs will be clearly and prominently placed at all external school gates and within the controlled area.
- Signage includes the reason for use of CCTV and the contact details of the school.
- The school has a full CCTV policy which is available on the schools website.
- Staff are aware that CCTV is in operation at all times.

### **External agencies with access to the system**

*Include here details of any third party organisations who will provide and/or maintain the system (or monitor the system), whether they will have access to the system, what restrictions will be placed on them accessing it, etc.*

- There is no access to the school's CCTV system by external agencies or third parties without prior consent from the Head Teacher.
- If faults develop with the system, an appropriate contractor support is sought and the system is repaired appropriately. Such contractors should have no access to images or recorded data as part of any remedial work undertaken.
- An annual service of the CCTV system will be carried out by Wessex Fire and Security.

### **Security of the system**

*Include details of what security measures will be in place to protect the CCTV images, etc. e.g. is the system password protected?*

- The hardware recorder and viewing monitor are stored in the server room which can be locked. Access to this area is for authorised adults only.
- Only the Headteacher, Business Manager and Caretaker are authorised to view the recorded images.
- Access to the software is password protected. The password is known only to the Headteacher and Business Manager.
- Recorded images, whilst temporarily stored for the purpose of investigation, will be properly indexed, recorded on a register and stored securely.

### **Retention of data**

*Include details here of how long the CCTV images will be held on the system, how it will be deleted (automatically or manually), who will have responsibility for this, etc.*

- The CCTV system will be operated 24 hours each day, 365 day of the year.
- Recorded data is stored on a stand alone hard drive with a record time of 14 days, after this time data is overwritten automatically.
- Where specific recorded data is stored additionally so as to support any investigations, it will only be retained for the period of any investigation. It will be manually deleted by the Business Manager at this stage. Such recorded images will be stored securely and only accessible to the Headteacher / Business Manager and recorded on a register.

### **Impact on privacy**

*Include here an assessment of the impact that this system will have on the privacy of individuals, how they will be affected, how the invasion of privacy will be minimised, etc.*

- Using CCTV can be privacy intrusive, because it is capable of putting law-abiding people under surveillance and recording their movements as they go about their day to day lawful activities. The general feeling is that people who are not involved in crime are happy to be in an area that is monitored by CCTV cameras. There are some members of society both law abiding and those who are not, who have issues with being in areas covered by CCTV cameras. By abiding with current legislation, we aim to show that the CCTV system is only used for its intended purpose as described above.
- Cameras are in a fixed positioned so that they cover areas of the school grounds (however this means that the system unavoidably also covers an area of public playing field in front of the school, there is a possibility of capturing images of members of the public who do not enter the school grounds).
- Images are not recorded in order to conduct 'covert monitoring' of staff or visitors unless in exceptional circumstances and with prior authorisation from the Head Teacher.
- The system has been installed on a proper and legal basis and comply with the DPA and NCP.
- Regular reviews of camera performance will be undertaken to justify their need.
- Image data will be automatically overwritten after 14 days.

**Previous assessments**

*Include details of any previous privacy impact assessments that have been conducted or any other assessments*

- The school has a formal CCTV Usage Policy November 2017.

**Other relevant information**

- Information can be found in addition to this document in the school's CCTV Policy. (Dated November 2017)
- Further advice can be found at the locations stated at the end of the schools CCTV Policy.

**Conclusions**

*Include here an analysis of the content of this assessment, your conclusions in relation to whether the system should be put in place, whether further actions are required for the system to be put in place, whether there should be further restrictions placed on how the system is used to minimise the impact on privacy, etc.*

- The school is satisfied that the current CCTV system in place at the school is necessary and sufficient so as to support the schools desire to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to school property.
- The school satisfies all external advice (e.g. ICO CCTV Code of Practice 2008) on the operation and usage of CCTV systems and has a compliant CCTV usage Policy in place.
- Monitor positions of cameras and adjust if necessary the recording area to minimise the capture of images from public areas (village playing field).

**Member of staff responsible for the assessment**

<b>Name</b>	Andi Chalk – School Business Manager
<b>Signed</b>	A R Chalk
<b>Dated</b>	21 November 2017

**Further actions required**

*State what actions are required before the system can be put in place or remain in place*

- N/A

**When the above actions have been completed the further actions must be signed as completed by the member of staff who carried out this assessment**

<b>Signed</b>	
<b>Dated</b>	

Dated: November 2017

Review: Autumn Term 2020