

CCTV Installation

Data Protection Impact Assessment

Organisation Name/Data Controller Name: Simonside Primary School

Date final Retrospective DPIA

CCTV DPIA

Project Brief and Go Live Date:

Simonside Manor Primary School is procuring a new CCTV system which will be installed to monitor activity on the school premises externally. Upon completion of the DPIA screening questions, the criteria was met for conducting a DPIA. The privacy concerns associated with surveillance must be considered and addressed in this document as required by Data Protection Legislation.

10 external cameras

- 2 x car park
- 1 x main entrance
- 2 x KS2 yard
- 1 x KS1 yard
- 1 x Kitchen entrance
- 1 x dinner hall entrance
- 1 x Early Years Entrance
- 1 x SENCO Entrance

1 internal camera

- Main entrance

The purpose of implementing the new CCTV system is to:

- Increase the health and safety and security of pupils, staff, and visitors
- Improve pupil behaviour in external recreational areas
- Reduce vandalism and damage to school property and infrastructure
- Provide assistance in the detection and prevention of crime

Reason for the installation: There have there been incidents of prior vandalism/crime/safeguarding or behavioural problems on the school site both during term time and school holidays.

The locality and functionality of the CCTV cameras referenced above are so that their use is not deemed to be overly privacy intrusive as data is not collected in more private contexts such as toilet areas.

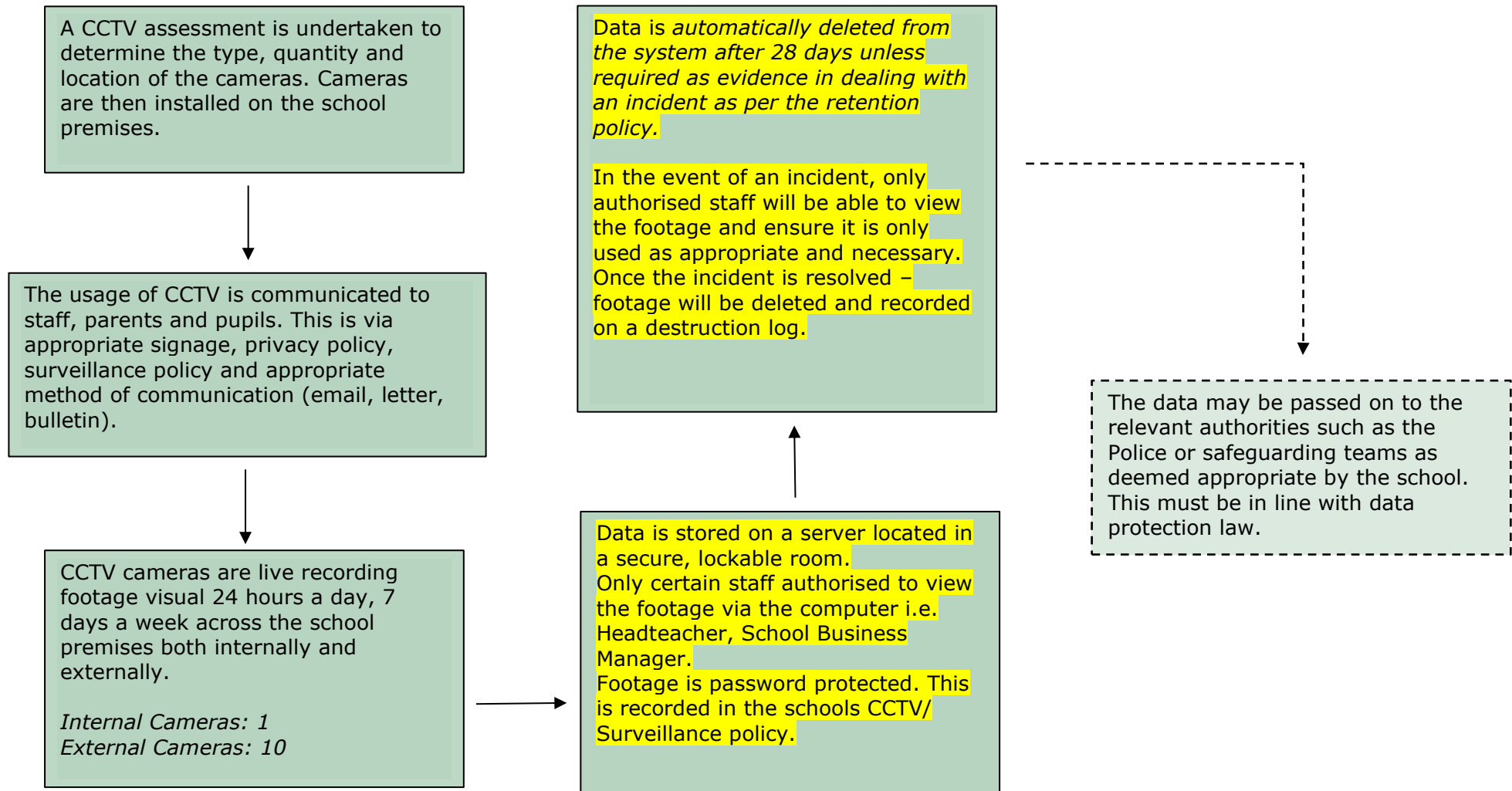
Project Manager/Owner:

Name:	Emma Hills
Job Title:	Headteacher
Service:	Simonside Primary School
Telephone:	0191 2860776
Email:	admin@simonside.newcastle.sch.uk

Information Asset Owner/s:

Name:	Charlotte Coon
Job Title:	School Business Manager
Service:	Simonside Primary School
Telephone:	0191 2860776
Email:	admin@simonside.newcastle.sch.uk

Part One – Information Flow



Part Two – Privacy Risks Questionnaire

Privacy Issue	Comments	Risk (Y/N) Address in Part Three
1. General		
Have you identified the Information Asset Owner?	Charlotte Coon – School Business Manager	
How many individuals will be affected by this project?	Maximum roll of 420 pupils, Parents / Carers of said pupils, 30 current staff and anyone who visits the school.	
Who are the Data Subjects?	Pupils, staff and any visitors to the school who are captured on CCTV	
Please select any information that will be processed:	Personal Identifiers/information	Special Category / Criminal
	<input type="checkbox"/> Name	<input type="checkbox"/> Sex life
	<input type="checkbox"/> Address/Postcode	<input type="checkbox"/> Sexual Orientation
	<input type="checkbox"/> Date of Birth	<input type="checkbox"/> Religion
	<input type="checkbox"/> Telephone Number/Email	<input type="checkbox"/> Philosophical belief
	<input type="checkbox"/> Emergency contact details	<input type="checkbox"/> Political opinion
	<input type="checkbox"/> National Insurance Number	<input type="checkbox"/> Trade Union Membership
	<input type="checkbox"/> NHS Number	<input type="checkbox"/> Ethnic Origin
	<input type="checkbox"/> Gender	<input type="checkbox"/> Medical history details
	<input checked="" type="checkbox"/> Images (photo/film)	<input type="checkbox"/> Physical health information
	<input type="checkbox"/> Pseudonymised information	<input type="checkbox"/> Mental health information
<input type="checkbox"/> IP addresses	<input type="checkbox"/> Genetic/Biometric (eg. Thumbprint)	
	<input type="checkbox"/> Other (please state):	<input type="checkbox"/> Criminal conviction information
How will the personal data be collected?	Directly from the Individual	

Privacy Issue	Comments		Risk (Y/N) Address in Part Three
	Other:		
Does this processing include data matching, automated decision making or profiling?	No		
2. Lawfulness, Fairness, and Transparency			
What is the lawful basis for processing personal information? If you are using more than one condition please specify which condition relates to specific data.	Article 6(e) Public task - processing is in the pupil’s interests for protection and safeguarding purposes. Article 6(1)(f) - processing is necessary for the purposes of the legitimate interests- prevention and detection of crime.		
If you are processing Special Category Information (highlighted in red above), what is the lawful basis for processing this information	N/A	N/A	
	Basis in law and schedule condition (if applicable)/specify: Although the images may indicate implications of certain categories of special category data by default i.e. physical disabilities, this is not the purpose of processing and so no lawful basis is required.		
If you are using consent how are you collecting this and how will people be able to withdraw their consent?	N/A – Not relying on consent.		
How will you tell people about this processing?	Appropriate signage will be installed on all entry points to grounds and in main visitors entrance. The signage should include: • Times of operation. Individuals will also be given further information in our Surveillance Policy which is on the ONE Trust website and hyperlinked from our website. Staff, Parents and Pupils will be informed by school bulletin to ensure transparency on behalf of the school.		

Privacy Issue	Comments		Risk (Y/N) Address in Part Three
Do you need to update your privacy notices?	<input type="checkbox"/>	Yes	N
	<input checked="" type="checkbox"/>	No	
3. Purpose Limitation			
Are you going to use information you already hold about individuals for a purpose it is not currently used for?	<input type="checkbox"/>	Yes, please specify why it is currently held and under which legal basis:	
	<input checked="" type="checkbox"/>	No	
Have you identified all of the purposes for which you will use personal information?	<input checked="" type="checkbox"/>	Yes	
	<input type="checkbox"/>	No. If no, why not?	
Will people expect their information to be processed in this way?	<input checked="" type="checkbox"/>	Yes	
	<input type="checkbox"/>	No, please give details:	
4. Data Minimisation			

Privacy Issue	Comments		Risk (Y/N) Address in Part Three
How will you ensure you are only collecting information that is relevant to this specific purpose?	<p>The information processed by the CCTV system will only be viewed if the school has a legitimate and justified reason to do so. It will only be viewed by authorised individuals when required as the school does not actively monitor the footage. Any viewing of the footage is recorded by an audit trail/ viewing log so viewing activity is traceable.</p> <p>The location of the cameras has been tested to ensure that these are not collecting data which would infringe on the rights of other individuals and on other properties.</p>		Y
Have you considered what information you could disregard without compromising the project?	<input checked="" type="checkbox"/>	Yes, please detail if any has been removed: It is not possible to disregard any information due to the nature of the processing however to limit the privacy intrusive nature of CCTV, we have opted to record without sound.	
	<input type="checkbox"/>	No	
5. Accuracy			
How are you going to ensure that the personal information will be kept accurate and up to date?	N/A		
If you are procuring a new system does it allow you to amend and / or delete information when necessary?	<input type="checkbox"/>	Yes	
	<input type="checkbox"/>	No, please give details:	
	<input type="checkbox"/>	Notes can be added to the system where accuracy is disputed	
	<input checked="" type="checkbox"/>	N/A	
6. Storage Limitation / Records Management			

Privacy Issue	Comments		Risk (Y/N) Address in Part Three
How long will the information be kept for? (retention period)	Recordings will usually be deleted automatically after 28 days. In certain instances the school may need to retain recordings for a longer period- for example if the CCTV footage is being used as part of a complaint or if it is needed for an investigation (i.e. by the Police). In this case, the footage will be retained until the investigation and any necessary appeals have finished. This information is set out in our Surveillance Policy.		Y
Are you procuring a system that will allow you to delete information in line with your retention periods?	<input checked="" type="checkbox"/>	Yes	
	<input type="checkbox"/>	No, if no why not?	
	<input type="checkbox"/>	N/A	
What method will be used, to securely destroy paper and/or electronic records?	The CCTV system is configured to automatically delete recordings after 28 days. Any information that is disposed of manually i.e. once the evidence has satisfied the needs of the investigation, the video footage is deleted from the system and recorded on the schools destruction log.		Y
Will destruction be certificated or added to a destruction log?	<input checked="" type="checkbox"/>	Yes, please specify:	
	<input type="checkbox"/>	No, if no why not?	
Where will information be stored/accessed?	Local Application		
	Other (specify):		
If you are using a 'Cloud Based' system to store or transfer information, where is the geographical location of the server/s	N/A		
If back up information is stored off-site, where is the geographical location?	N/A		

Privacy Issue	Comments		Risk (Y/N) Address in Part Three
7. Security			
Who will have access to the information?	Headteacher, School Business Manager		Y
What controls have been put in place to limit access to the information?	The computer and drive is password protected with only nominated staff granted access to files. The use of the computer is subject to audit trails and any staff viewing footage are required to record this in the internal CCTV log.		Y
If you are implementing a new system, does this system have the ability to audit access (audit trails)?	<input checked="" type="checkbox"/>	Yes	
	<input type="checkbox"/>	No	
	<input type="checkbox"/>	N/A	
Does your new system/hardware/procedure provide adequate protection against security risks? Please detail.	Restricted log ins with individual passwords. Audit trail will show which member of staff has accessed this.		
Are staff undertaking any additional training to help use new systems/procedures? Will this include Data Protection training?	<input checked="" type="checkbox"/>	Yes – annual training plan in place	
	<input type="checkbox"/>	No. If no why not?	
Is there a disaster recovery plan in place in case of equipment/software failure?	<input type="checkbox"/>	Yes	
	<input checked="" type="checkbox"/>	No	
8. Data Processors – Data Processors should be listed after part 2 of this form			

Privacy Issue	Comments		Risk (Y/N) Address in Part Three
If you are using a data processor, how has the provider demonstrated an adequate level of information security?	N/A The recordings are being held onsite on the CCTV server		
If using a data processor, how has the provider demonstrated that they are compliant with the UK GDPR?	N/A		
If using a data processor, do you have a written contract in place with the UK GDPR clauses?	<input type="checkbox"/>	Yes (please attach)	
	<input type="checkbox"/>	No	
	<input checked="" type="checkbox"/>	N/A	
9. Information Sharing – Data Controllers should be listed after part 2 of this form			
What is the legal basis for sharing?	Any information sharing as a result of this processing will be conducted on an ad hoc basis in line with data protection law. This may include sharing information with the Police for the purposes of crime detection. Advice will be sought from data protection officer if necessary.		
Is there a sharing agreement in place?	<input type="checkbox"/>	Yes (please attach)	
	<input type="checkbox"/>	No. If no, why not?	
	<input checked="" type="checkbox"/>	N/A	
Will you transfer information outside of the UK, where will this be?	<input type="checkbox"/>	Yes, please specify where:	
	<input type="checkbox"/>	No	
	<input checked="" type="checkbox"/>	N/A	
How will information be transferred?	Any information shared- for example with the Police, will be done so securely. We may ask the Police to come onsite and view the information or if it is to be transferred it will be done with the appropriate technical measures in place such as encryption.		

Privacy Issue	Comments		Risk (Y/N) Address in Part Three
10. Rights of the Data Subject			
How will you manage 'Subject Access Requests' or other requests regarding information rights?	In line with the ONE Trust policies.		
If procuring a new system, will this allow you to fulfil the rights of the data subject mentioned above?	<input checked="" type="checkbox"/>	Yes, detail as needed:	
	<input type="checkbox"/>	No	
If the project involves automated decision making do you have a process in place to facilitate human intervention? Please detail.	N/A		
Will your data processing exclude individuals from using a service or from exercising any rights?	<input type="checkbox"/>	Yes, detail as needed:	
	<input checked="" type="checkbox"/>	No	
11. Accountability			
As a result of this project do you need to update any of the following?	<input checked="" type="checkbox"/>	Information Asset Register	Y
	<input type="checkbox"/>	Policies	
	<input type="checkbox"/>	Procedures	
If needed, have you consulted relevant stakeholders/ /ICO? What was the outcome?	<input checked="" type="checkbox"/>	Yes, who? Please add outcome details: Governing body and DPO consulted.	
	<input type="checkbox"/>	No	

List any Data Controllers information will be shared with (if applicable):

Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	

List any Data Processors information will be processed by (if applicable):

Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	
Name:	
Contact Details:	

Part Three – Risk Evaluation

Privacy Risks (from part two) Describe source of risk and potential impact on individuals, compliance and corporate risks (as needed)	Options to reduce or eliminate risk	Evaluation eliminated, reduced, accepted
Areas beyond the school boundary such as residential property, and subsequently members of the public, will be recorded.	The CCTV cameras have been installed and positioned away from residential areas.	Eliminated.
Individuals are unaware this processing of information/ surveillance is ongoing.	The signage will be clear and located where surveillance is taking place. The signs include: <ul style="list-style-type: none"> • Times of Operation. The relevant privacy notice/ policy documents will be updated accordingly. Communications will be sent to parents/guardians and pupils to notify them of the CCTV implementation.	Eliminated.
Information Asset Register / Article 30 needs updating	The school will review its IAR	Eliminated
Images being accessed by those who are not authorised to access them or used inappropriately by individuals.	The acceptable use of this CCTV software is set out in annual training of staff and all policies are sent out and staff sign to accept their responsibilities within them. Misuse is dealt with following the relevant disciplinary procedure. Specified staff are granted permissions to access the footage and storage room. Relevant and proportionate training will be provided to the authorised members of staff granted permission to access CCTV footage. Training should refer to the processing, usage, storage, retention and deletion of this data.	Reduced
Data is not deleted as per the retention policy	Annual review with IBS to check this process is happening.	Reduced

	A process will be agreed and documented on the handling of images copied from the system and retained for a lawful purpose until no longer required. All such destruction will be recorded on the destruction log.	
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Part Four – Signatures and Review

Information Asset Owner

Name: Joanne Hogarth

Job Title: School Business Manager

Date: 07/11/2024

Signature: 

Data Protection Officer

Name: Veritau

Job Title:

Date: Click or tap to enter a date.

Signature:

Senior Officer/Caldicott Guardian (If Applicable)

Name:

Job Title:

Date: Click or tap to enter a date.

Signature:

REVIEW DATE: 28/11/2025