Campion School

CCTV Privacy Impact Assessment

Dated: Oct 2021

Review: Oct 2023

CCTV Privacy Impact Assessment for Campion School

Name of member of staff responsible for the system	Mr Brian Langley
Position	Business Manager

Name of person carrying out the assessment	Mr Brian Langley
Position	Business Manager

Assessment Date	01 October 2021
Review Date (at least every 2 years)	Late Autumn Term 2023

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. Retrospective assessment based on historic installation. 1. Data recorder and viewing screen based in store adjacent to HR Dept. Access is limited, via key, to Business Manager, Reprographic Technician and Caretakers only. (NB. Only Business Manager has access rights to equipment). 2. Images from the camera equipment can be viewed 'live' at all times (by authorised controllers) but images are only 'recorded' when the cameras detect movement. These recorded images are stored on the data recorder for no longer than 7 days before being automatically permanently deleted. 3. Whilst there is a facility for some of the camera's to view 'roaming' images, the school chooses to use them in fixed positions for most of the time. 4. The system is in operation 24 hours per day. 5. There are 6 cameras on site. Cameras are located at the following positions:- • External, multi-directional, remote camera fixed to first floor elevation of Art block. Positioned to view external rear elevations of the school building at this location. • External, multi-directional, remote camera fixed to first floor elevation of the main school hall. Positioned to view externally the D&T and Post 16 buildings at this location. • External, multi-directional, remote camera fixed to first floor elevation of Room A13. Positioned to view external elevations of the music block building at this location. • External, multi-directional, remote camera fixed to first floor elevation of Head Teachers Office. Positioned to part view the school driveway / path and bicycle racks at this location. • External, fixed camera to first floor elevation of Gymnasium. Positioned to view staff / visitor car park at this location.

- Internal, fixed camera to ground floor main corridor. Positioned to view pupil locker area and main corridor.

6. Additionally, in March 2019, a small independent system of 4x CCTV cameras with sound monitoring function were installed to the schools 'Alternative Provision Centre' (APC). This area is where some of our more challenging pupils are located and the system was installed to protect/monitor the staff and pupils from any unacceptable behaviour and/or false claims of incident.

- The APC system is NOT connected to the schools main system. It is connected to the APC Managers mobile phone and laptop only via a password protected internet connection.
- Access to the images from this CCTV system are strictly only available to the APC Manager and the Schools Behaviour Manager.
- Images are recorded for a short period of time before being automatically permanently deleted.
- The 4 cameras are in fixed locations and have no 'roaming' facility.
- The 4 cameras give a general 'room view' and are NOT directed at any individual.
- The system is in operation 24 hours per day.

7. Additionally, in June 2021, a small independent system of 2x CCTV cameras with no sound monitoring function were installed to the schools 'Main School Reception'. This area is where all visitors access the main school site during the school day of 9am to 3pm and the system was installed to protect the reception staff and pupils from any unacceptable behaviour and/or false claims of incident.

- The 'Reception' system is NOT connected to the schools main system. It is connected to a standalone recorder and monitor accessible to reception/IT staff only via a password protected connection.
- Access to the images from this CCTV system are strictly only available to the Receptio staff and the IT Manager.
- Images are recorded for a short period of time before being automatically permanently deleted.
- The 2 cameras are in fixed locations and have no 'roaming' facility.
- The 2 cameras give a general 'room view' and are NOT directed at any individual.

Purposes of the CCTV system

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

- Campion School uses closed circuit television (CCTV) and the images produced 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.

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 have been introduced over the years to improve security and safety, new external perimeter fencing, electronic door locks, upgrading and expansion of security alarms 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 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 does not cover any area outside of the main school site and its grounds. There is no 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
• Mr Jassa Panesar, Head Teacher and School 'Data Controller'.   • Mr Brian Langley, Business Manager and 'CCTV System Manager'.   • Mr Richard Hartshorn, Senior ICT Technician. Richard has the password access to the system to use in the absence of Brian Langley.   • Mr Steven Long, APC Manager – APC independent system ONLY.   • Mrs Tracey Calder, Receptionist – Main School Reception system ONLY.

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 only 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.   • Images will only be accessed by those authorised to do so.   • Any useful images may / will be used to assist internal or local authority investigations.   • Any images which are stored as 'recorded' for future reference, will be stored securely and deleted at the appropriate time when they are no longer required.

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.

- Signage is located at the main school entrance and in other locations around the site adjacent to camera equipment.
- Signage includes the reason for use of CCTV and the contact details of the school.
- The school has a full CCTV usage 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 system manager / Head Teacher of the school.
- If faults develop with the system, 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.

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 securely in a locked store cupboard. Access keys are kept only by the Business Manager, Caretaking staff and Reprographic Technician (used as main reprographic store also). Only the Business Manager is authorised to view the images at this viewing monitor.
- Access to the software to view the images (live and/or recorded) on a PC is limited to the Business Managers Office and the Resident Site Managers accommodation. Access to the software is password protected. The password is known only to the Business Manager, Senior ICT Technician and Resident Site Manager.
- Recorded images, whilst temporarily stored for the purpose of investigation, are done so with further password protection.

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 camera / recorder system used only automatically records images to the hard drive when movement is detected. This is the case 24 hours per day. Data is automatically, permanently deleted from the hard drive after 7 days.
- 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 password protected and only accessible to the Business Manager and/or Senior ICT Technician.

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.

- Cameras are positioned so that they only cover areas of the school buildings and grounds. They do not cover any 'public or private space'.
- Only people visiting the school will have images temporarily recorded (unless such images are used for further investigations in relation to incidents).
- 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.

Previous assessments

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

- Previous privacy impact assessments are recorded to file (last one dated December 2019)
- The school has a formal CCTV Usage Policy revised in October 2021.

Other relevant information

- Comprehensive information can be found in addition to this document in the school's CCTV Usage policy. (Dated October 2021)
- 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 2018) on the operation and usage of CCTV systems and has a compliant CCTV usage Policy in place.

- No further actions are deemed necessary at this review.

Member of staff responsible for the assessment

Name	Brian Langley – Business Manager
Signed	*B P Langley*
Dated	1 October 2021

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	
Signed	
Dated	