

Privacy Impact Assessment (PIA) for: CCTV

Data Protection Principles

- processing to be lawful and fair
- purposes of processing be specified, explicit and legitimate
- adequate, relevant and not excessive
- accurate and kept up to date
- kept for no longer than is necessary
- processed in a secure manner

Why we need a Privacy Impact Assessment – screening questions

We need to complete this form because:

- the use involves the collection of new information about individuals;
- the use compels individuals to provide information about themselves;
- the information about individuals will be disclosed to organisations or people who have not previously had routine access to the information;
- we are using information about individuals for a purpose it is not currently used for, or in a way it is not currently used;
- we are using new technology that might be perceived as being privacy intrusive e.g. the use of biometrics or facial recognition; (CCTV)
- the use results in us making decisions or acting against individuals in ways that can have a significant impact on them;
- the information about individuals is of a kind particularly likely to raise privacy concerns or expectations, e.g. health records, criminal records or other information that people would consider to be private;
- the use requires us to contact individuals in ways that they may find intrusive.

Adapted from <https://ico.org.uk/media/for-organisations/documents/1042836/pia-code-of-practice-editable-annexes.docx>

<p>Describe the service</p> <p>Milverton Community Primary and Pre-school plans to use 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.</p> <p>CCTV is not a requirement of the school's insurance policy but is a recommendation from our insurers.</p> <p>The lawful basis for the use of the CCTV system is Article 6(1)(f) of GDPR: Legitimate Interests of the Data Controller. In using this as our lawful basis, we have assessed:</p> <ul style="list-style-type: none"> • Purpose: the processing fulfils a clear function - indicating possible criminal acts or threats to the security of pupils/staff/visitors (the public) • Necessity: we consider that the CCTV system is the only reasonable way to meet this objective, and we have ensured that it is processed with as little intrusion into the privacy of individuals as possible • Balancing: We recognise that this data processing may be considered sensitive, but we have taken measures to minimise the negative impact on individuals. No audio is recorded on the CCTV throughout the site. 	
<p>Describe the data collected and the possible uses of the data</p>	
<p>List of data held</p> <p>Any user or visitor to the main school site could be captured on the CCTV system, this</p>	<p>Collection of data</p> <ul style="list-style-type: none"> • CCTV cameras are in place throughout the external site • Cameras will capture video footage and still images • No audio will be captured • All cameras are fixed • All data is stored securely on a separate network and held on a secure CCTV server • CCTV viewing equipment is held in a secure, locked room, access to which is limited to the individuals outlined in the school's CCTV policy

<p>could include; pupils, parents, staff, visitors, contractors etc</p>	<ul style="list-style-type: none"> • CCTV viewing equipment is secured by PIN, and access is only available to those outlined in the CCTV policy • No live monitoring of CCTV will take place in line with our CCTV policy • CCTV footage is configured to be retained for the retention period set out in our CCTV policy (<i>approx. 2 months</i>) and after this date it will be deleted 		
	<p>Possible uses</p> <ul style="list-style-type: none"> • The school will only use surveillance cameras for the safety and security of the school and its staff, pupils and visitors. • Surveillance will be used as a deterrent for violent behaviour and damage to the school and signage will be clearly visible. • The school will only conduct surveillance as a deterrent and under no circumstances will the surveillance and the CCTV cameras be present in general classrooms, any changing facility or toilets. There are no internal cameras. • If the surveillance and CCTV systems do not fulfil their purpose and are no longer required, the school will deactivate them. 		
<p>Identify the privacy, related risks and possible solutions</p>			
<p>Privacy issue</p>	<p>Risk to individuals</p>	<p>DPA Risks</p>	<p>Possible Solutions</p>

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<p>Surveillance methods may be an unjustified intrusion on privacy.</p>	<p>Low/Medium</p>	<p>Breach of principle 1 of GDPR – lawful, fair, transparent; principle 3 – data minimisation</p>	<p>Cameras are positioned so that they only cover areas of the school buildings and grounds. They do not cover any ‘public or private space’ that is not part of school grounds. Where any camera’s field includes areas (although still part of the School grounds) to which the public have access, signs will be provided to inform the public of this.</p> <p>Monitoring will not take place, and access to CCTV footage will be restricted as outlined in our CCTV policy.</p> <p>Images are not recorded during the school day.</p>
<p>If a retention period is not established information might be used for longer than necessary.</p>	<p>Low</p>	<p>Breach of principle 5 of GDPR – storage limitation; principle 2 – purpose limitation</p>	<p>CCTV equipment is configured to retain footage in line with CCTV policy (2 months: to ensure coverage over school holidays). In the event of an incident that requires that footage is held for longer than this period, footage will be retained in accordance with Police, Criminal Justice or Civil Court guidelines.</p>
<p>Access to the system by unauthorised parties (Hacking)</p>	<p>Significant</p>	<p>Breach of principle 6 of GDPR – security</p>	<p>All cameras to be hard cabled and system will require password to be entered to be accessible. Password only known to limited number of employees.</p> <p>Remote access is restricted to necessary use and again is password protected.</p>

<p>Unauthorised Disclosure</p>	<p>Significant</p>	<p>Breach of principle 6 of GDPR – security</p>	<p>Internal guidance will be provided in the form of a CCTV policy which clearly states who data will be shared with and why. Privacy notices and signage will allow individuals to be informed of CCTV usage. No audio recording. Limited access to recordings. Retention is 2 months in the usual course of events. Only the team outlined in the CCTV policy will have access to the system. We will only share data with:</p> <ul style="list-style-type: none"> • The police – where the images recorded would assist in a specific criminal inquiry • Prosecution agencies – such as the Crown Prosecution Service (CPS). Relevant legal representatives – such as lawyers and barristers where legal advice is sought • Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000 • Staff with appropriate responsibility for completing formal investigations into serious breach of school rules.
<p>Sign off and notes</p>			
<p>Comments on risks</p>		<p>Processes that must be in place</p>	

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Security flaws – cameras may malfunction or retain data longer than expected	Ensure proper maintenance and that cameras are checked termly to ensure necessary footage is still be recorded, and that old footage is being deleted
Signage may not be up to date	Data Lead to check that CCTV signage is still clearly visible on termly walks around the school
Access to footage may be given to unauthorised personnel	Data Lead and DPO must be consulted before any footage is shared with third parties - see CCTV policy
<p>Contact point for future privacy concerns</p> <p>Data Protection Officer: dposchools@somerset.gov.uk</p> <p>Data Protection Lead: Richard Stead</p> <p>Date completed: 25/09/2024</p>	