

# Data protection impact assessment

## STEP 1: IDENTIFY THE NEED FOR A DPIA

Explain broadly what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal.

Summarise why you identified the need for a DPIA.

This Data Impact Assessment is to look into the introduction of a new CCTV system or to improve an existing system within a trust school. This is outlined in our CCTV policy.

## STEP 2: DESCRIBE THE DATA PROCESSING IN MORE DETAIL

### NATURE OF THE DATA PROCESSING

How will you collect, use, store and delete the data?

What is the source of the data?

Will you be sharing the data with anyone? (You might find it useful to create a flow diagram)

What types of processing are involved that can be identified as potentially high risk?

The data will be collected through various CCTV cameras around the school and stored on a drive within the academy IT network. The data is automatically deleted after a 30 day period.

The purpose of the CCTV system is to:

- Make members of the school community feel safe
- Protect members of the school community from harm to themselves or to their property
- Deter criminality in the school
- Protect school assets and buildings
- Assist police to deter and detect crime
- Determine the cause of accidents
- Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings
- To assist in the defense of any litigation proceedings
- Manage behaviour of students

The data will not routinely be shared. If the footage gathered can be used to support any of the above this will be shared with relevant personnel.

SCOPE	
What is the nature of the data, and does it include special category or criminal offence data?	The data is digital recording and images, no sound.
How much data will you be collecting and using?	The CCTV will record 24 hours per day 365 days per year.
How often?	Footage will be kept for 30 days, unless recorded to support any of the reasons listed above.
How long will you keep it?	Any staff, students and visitors to the academy will be recorded while on the site.
How many individuals are affected?	The cameras cover the majority of the external site, internal corridors and communal areas. There are a small number in classrooms where high value items are stored.
What geographical area does it cover?	

CONTEXT	
What is the nature of your relationship with the individuals?	Staff, students and visitors to the academy.
Do they include children or other vulnerable groups?	Yes, students are all aged between 11 and 16 years.
How much control will they have over the processing?	The school population will have no control over the processing.
Would they expect you to use their data in this way?	CCTV operation signage is up around the external and internal areas of the building to notify anyone on the premises they are in a CCTV controlled area.
Have there been prior concerns or previous security flaws to do with this type of processing?	No concerns raise previously about CCTV in school, this is a upgraded system with better resolution cameras.
Is it novel in any way?	No CCTV systems are a regular occurrence in lots of settings.
What is the current state of technology in this area and are there any current issues of public concern that you should factor in?	No concerns, the IT is well protected and monitored by out IT company, Novus.

PURPOSE	
What do you want to achieve?	<p>The intent of introducing the CCTV cameras is to support the school community providing a safe environment in which to work and study.</p> <p>This will also support the reduction of damage and vandalism to the site.</p>
What is the intended effect on individuals?	
What are the benefits of the processing for you, and more broadly?	

STEP 3: CONSULTATION PROCESS	
Explain how you will consult with relevant stakeholders	
<p>When and how will you seek individuals' views on your data processing activity?</p> <p>If you feel it's not appropriate to consult with relevant stakeholders, how can you justify this decision? (Make sure you always record any decision not to consult)</p> <p>If you are consulting, who else within your organisation do you need to involve?</p> <p>Do you need any of your data processors or any other third parties to help with the consultation?</p> <p>Do you plan to consult information security experts, or any other experts?</p>	<p>Our Schools have had CCTV installed for a number of years. Any changes to the system would be to upgrade the current system so it is more effective. No concerns were raised during previous installation. Wider consultation with the school community is not planned for technical upgrades.</p>

STEP 4: ASSESS NECESSITY AND PROPORTIONALITY	
Describe how you will make sure you comply with data protection law, and keep the processing proportionate to what you actually need	
What is your lawful basis for processing the data in this way?	The purpose of the CCTV system is to:

#### STEP 4: ASSESS NECESSITY AND PROPORTIONALITY

<p>Does the processing actually achieve your purpose?</p> <p>Is there a less intrusive way to achieve the same outcome?</p> <p>How will you make sure the data is good quality and limited to what is necessary?</p> <p>What information will you give individuals about how their data is used?</p> <p>How will you help to support their rights under the UK GDPR?</p> <p>What measures do you take to ensure processors and other third parties comply with data protection law?</p> <p>How do you safeguard any international transfers of the data?</p>	<ul style="list-style-type: none"> <li>• Make members of the school community feel safe</li> <li>• Protect members of the school community from harm to themselves or to their property</li> <li>• Deter criminality in the school</li> <li>• Protect school assets and buildings</li> <li>• Assist police to deter and detect crime</li> <li>• Determine the cause of accidents</li> <li>• Assist in the effective resolution of any disputes which may arise in the course of disciplinary and grievance proceedings</li> <li>• To assist in the defense of any litigation proceedings</li> <li>• Manage behaviour of students</li> </ul> <p>Yes the system fulfills the purpose, there is no alternative less intrusive method.</p> <p>There is a time limit on recordings being kept and the CCTV is not in every area of the school.</p> <p>The monitoring of footage is minimized to a limited number of people and anyone who views footage will need to log that they have viewed it.</p>
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#### STEP 5: IDENTIFY AND ASSESS RISKS

Describe the source of risk and the nature of potential impact on individuals	Likelihood of harm (remote, possible or probable)	Severity of harm (minimal, significant or severe)	Overall risk (low, medium or high)
<p>Risks may include:</p> <ul style="list-style-type: none"> <li>• A privacy breach caused by technical issues or human error, where individuals are at risk of discrimination, identity theft, fraud, loss of confidentiality, reputational damage, physical or emotional harm</li> </ul>	Remote	Significant	<p>Low risk.</p> <p>Digital security systems in place and well managed</p>

### STEP 5: IDENTIFY AND ASSESS RISKS

<ul style="list-style-type: none"> <li>Poor processes or inadequate due diligence leading to non-compliance with the UK GDPR, resulting in financial or reputational damage to the school</li> </ul>	Remote	Minimal	Internal processes in place to support good management of the system

### STEP 6: IDENTIFY MEASURES TO REDUCE RISK

For risks identified as medium or high, identify additional measures you will take to reduce or eliminate the risk

Risk	Options to reduce or eliminate risk	Effect on risk (eliminated, reduced or accepted)	Residual risk (low, medium or high)	Measure approved (yes or no)
Unauthorized viewing of footage	Footage can only be viewed on site and by specific personnel. Logging procedure in place to record any time someone accesses footage	Accepted	Low	

### STEP 7: SIGN OFF AND RECORD OUTCOMES

	Name, position and date	Actions
Measures approved by:		Integrate actions back into project plan, with date and

## STEP 6: IDENTIFY MEASURES TO REDUCE RISK

		responsibility for completion
Residual risks approved by:		If accepting any residual risk, consult the ICO before going ahead with the project
DPO advice provided:		DPO should advise on compliance, step 6 measures and whether processing can proceed
Summary of DPO advice:		
DPO advice accepted or overruled by:		
If the advice was overruled, explain why:		
Consultation responses reviewed by:		
If your decision is not the same as individuals' views, explain why, and why you have decided to continue with the processing:		
This DPIA will be kept under review by (name and position):	Allan Howells Trust Data Protection Officer	
Date:	August 2023	

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