

Data Protection Impact Assessment Procedure – CCTV

If the screening questions in Appendix A have identified the need for a DPIA use the following template to record your DPIA process and results. Please refer to the guidance in appendix C.

Step 1: Describe the nature of the data processing

Answer all questions in this section.

Department(s)	CCTV surveillance system across its premises.
Q1: Brief description of the processing	<p>Cameras are sited to ensure that they cover School premises as far as is possible. Cameras are installed throughout the school's sites including roadways, car parks, external buildings and externally in vulnerable public facing areas.</p> <p>Cameras are not sited to focus on private residential areas. Where cameras overlook residential areas, privacy screening or software masking will be utilised.</p> <p>The CCTV system is operational and capable of being recorded for 24 hours a day, every day of the year.</p>
Q2: Why do you need to undertake this processing? What are the benefits to the organisation and or data subjects?	<p>CCTV delivers benefits in terms of improved health and safety and security. It complements other security measures which are in place within the school,</p> <p>and it aims to achieve the following:</p> <ul style="list-style-type: none"> • Improve the health and safety and security of pupils, staff, and visitors • Protect the school buildings and internal infrastructure • Reduce vandalism • Provide assistance in the detection and prevention of crime • Parents have the assurance that their children are safe whilst in school.
Q3: Types of personal data that will be processed	<p>The CCTV captures video recordings and by default may be picking up special category data including race/ethnic origin and the health of an individual</p> <p>Special category personal data? <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No</p>



Q4: Whose personal data is it?	Pupils, staff and visitors. They can also detect unauthorised visitors and intruders to the school site.
Q5: What IT (software packages) are used in processing the personal data?	The system is a Hik Vision System maintained by Click 24 limited the images are stored for a rolling period of 30 days and automatically deleted.
	Is this new to the users? <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
Q8: Do you share the personal data outside of United Learning?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
	If yes are you sharing the data with a <input type="checkbox"/> data controller or a <input type="checkbox"/> data processor?
	The information stored is to ensure the Health & Safety of our staff, pupils and visitors. If it detects unauthorised visitors or acts of vandalism the images may be shared with Senior Leaders within school but also shared with the Police for investigation and enforcement purposes.
Q9: Are there any other relevant stakeholders who should be consulted with?	Signs have been installed detailing the use of CCTV in school. Governors, trustees and parents are aware of the use of CCTV and its purpose. School has a CCTV policy in place.

Step 2: Establishing the lawfulness of the processing

Please indicate which of the legal basis you are relying on to process the personal data. Please refer to your Data Protection Lead and guidance regarding the legal basis for processing personal data		
(a) the data subject has given consent to the processing of his or her personal data for one or more specific purposes;	<input type="checkbox"/>	If yes please refer to the policy for obtaining and recording consent. State here how you will collect consent and where you will record it.
(b) processing is necessary for the performance of a contract to which the data subject is party or in order to take steps at the request of the data subject prior to entering into a contract;	<input type="checkbox"/>	If yes, what type of contract are you referring to? <input type="checkbox"/> Employment



		<input type="checkbox"/> Independent school parent contract <input type="checkbox"/> Other contract (please specify) <hr/>
(c) processing is necessary for compliance with a legal obligation to which the controller is subject;	<input type="checkbox"/>	If yes please specify the legal obligation
(d) processing is necessary in order to protect the vital interests of the data subject or of another natural person;	<input checked="" type="checkbox"/>	If yes please specify what you consider the vital interests to be The interests are the safety of Staff. Pupils and visitors to site
(e) processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller; (academies only)	<input type="checkbox"/>	<input type="checkbox"/> The processing is an ordinary part of running a school?
(f) processing is necessary for the purposes of the legitimate interests pursued by the controller or by a third party, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection of personal data, in particular where the data subject is a child	<input type="checkbox"/>	<input type="checkbox"/> The processing is an ordinary part of running a school? (Independent Schools) <input type="checkbox"/> The processing is for the purpose of keeping in touch with alumni <input type="checkbox"/> The processing is for another purpose (please specify) To provide UT trainees with a way to stay in touch with/ support each other during their training, between irregular face to face sessions.

2b) Will you be processing any of the following special categories of personal data?	Yes it is possible that the CCTV may pick up special category data including race/ethnic origin and the health of an individual
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- Racial and ethnic origin
- Political opinions
- Religious or philosophical beliefs
- Trade union membership
- Health data
- Sex life
- Sexual orientation
- Genetic data
- Biometric data for the purpose of uniquely identifying a natural person

If yes please indicate which of the following legal basis you are relying on to process the data.

GDPR article 9 (a) the data subject has given explicit consent to the processing of those personal data for one or more specified purposes,	<input type="checkbox"/>	If yes state how you will collect consent and where you will record it.
GDPR article 9 (b) & DPA 2018 Sch 1 part 1 s1 processing is necessary for the purposes of carrying out the obligations and exercising specific rights of the controller or of the data subject in the field of employment and social security and social protection law in so far as it is authorised by Union or Member State law	<input type="checkbox"/>	If yes please state which laws are applicable Health & Safety at work act Safeguarding Vulnerable Groups Act Employment Practices Code
GDPR article 9 (f) processing is necessary for the establishment, exercise or defence of legal claims;	<input type="checkbox"/>	
GDPR article 9 (h)) & DPA 2018 Sch 1 part 1 s2 processing is necessary for the purposes of preventive or occupational medicine, for the assessment of the working capacity of the employee,	<input type="checkbox"/>	
DPA 2018 Sch 1 part 1 s5 Processing is necessary for statutory and government purposes	<input type="checkbox"/>	
DPA 2018 Sch 1 part 1 s8 Necessary for identifying or keeping under review the existence or absence of equality of opportunity or treatment	<input type="checkbox"/>	
DPA 2018 Sch 1 part 1 s16	<input type="checkbox"/>	



Support for individuals with a particular disability or medical condition		
DPA 2018 Sch 1 part 1 s17 Processing necessary for the provision of confidential counselling advice or support where the consent of the data subject cannot be obtained	<input type="checkbox"/>	
DPA 2018 Sch 1 part 1 s18 Necessary to protect an individual from neglect or physical, mental or emotional harm or to protect the physical, mental or emotional wellbeing of an individual	<input type="checkbox"/>	
DPA 2018 Sch 1 part 1 s20 Necessary for insurance purposes and is in the substantial public interest	<input type="checkbox"/>	
DPA 2018 Sch 1 part 1 s21 Necessary for the purpose of making a determination in connection with eligibility for, or benefits payable under, an occupation pension scheme Where the data subject is a relative of a member of the scheme.	<input type="checkbox"/>	

Step 3: Assessing compliance and identifying risks

3 (a) lawfulness, fairness and transparency

Question	Response	Further action if required
Q1. Is the processing covered by the school's privacy notice?	Yes	
Q2. If new data is being collected do the data collection forms clearly explain what the data will be used for and who it will be shared with?	Not new data.	



3 (b) purpose limitation

Question	Response	Further action if required
Q1. Has a clear purpose for the processing been identified and documented? Please state the purpose above.	Yes -for the safety of our staff, pupils and parents and to protect the school buildings and assets	
Q2. Are you using the data for the purpose for which it was collected? Please list this here.	Record and store images to deter criminal activity	
Q3. Is the processing covered by the record of data processing activities?	yes	
Q4. How will you ensure use of the personal data is limited to these purposes?	The data will only be shared by UL, SLT and the Police upon request. School will follow the CCTV Policy	

3 (c) data minimisation



Question	Response	Further action if required
Q1. Is each category of data that will be used necessary and relevant for the project? Is there any data you could not use and still achieve the same goals?	The recording of images is necessary for the security of the school and the safety of our pupils, staff and visitors, data is only kept for a period of 28 days	
Q2. Is the data being used adequate for the purposes of the project? <i>For example if you are making decisions about people are you collecting enough information?</i>	Yes	
Q3. Can the data be pseudonymised / anonymised for the project?	No	

3 (d) accurate and up to date

Question	Response	Further action if required
Q1. What steps will be taken to ensure the data used is accurate?	The cameras provide a clear image, they have the date and time on each recording.	



Question	Response	Further action if required
Q2. How will the accuracy of the data be maintained? Can records be easily amended?	CCTV system is maintained to ensure that the quality of the images recorded is of a high standard	
Q4. Will multiple copies of records be created? How will you keep track of these and ensure they are all	Only one copy will be retained for a period of 28 days then it is automatically wiped.	A log shall be kept of requests to access recorded images by staff and whether any recorded images have been copied to support specific investigations.

3 (e) Data retention and destruction

Question	Response	Further action if required
Q1. Is the data used for the project covered by the school's record retention policy?	Yes	
Q2. How long will the data used be retained?	28 days	
Q3. How will you ensure the destruction of the data when it is no longer needed?	Automatically wiped after 28 days	



Question	Response	Further action if required
Q4. Will multiple copies of the data be created? If so how will you keep track of the copies and ensure they are destroyed?	No	

3 (f) Rights of the data subject

Question	Response	Further action if required
Q1. Can the data be searched in the event of a SAR and an individual's information extracted?	Only for 28 days unless a copy is taken as per the CCTV policy	
Q2. Can one individual's data be deleted in the event of a successful request to have data erased?	Data is automatically deleted after 28 days	
Q3. Is any processing under the project likely to cause damage or distress to individuals?	No	The school does inform pupils staff and visitors that CCTV is in use by installing signs
Q4. Does the project involve any direct marketing?	No	
Q5. Does the project involve any automated decision making?	No	



3 (g) Data security, integrity and confidentiality		
Question	Response	Further action if required
Q1. Who will have access to the data?	Nominated, trained staff, Site Manager, Admin officer and SLT	
Q2. How will access to the data be granted?	Only named staff can use it and are responsible for recording in a log book	
Q3. If using a secure system can you / will you prevent the data from being downloaded from the system / printed?		
Q4. If storing in office 365 how will you control access to the data and prevent proliferation of copies?	N/A	
Q5. If storing the personal data in paper form how will you ensure it is kept secure?	N/A	
Q6. How will data be shared by people working on the project?		



3 (h) If there are any data processors involved in the project please answer the following questions for each data processor (i.e. you may be using a software developer and a data aggregator)

Question	Response	Further action if required
Q1. How will the data processor access the data?		
Q2. What security guarantees do you have? Please complete the Cyber Security due diligence questionnaire (annex F) and attach to the DPIA.		
Q3. Is the contract compliant with Article 28 GDPR? (see annex E for requirements)		
Q4. How will the actions of the data processor be monitored and enforced?		
Q5. Will the data processor keep the personal data within the EU? Please state which countries the personal data may/will be stored in.		<i>If the data will be stored or otherwise processed outside the EU the DPO's team must be consulted.</i>

3 (i) If your project involves use of a website



Question	Response	Further action if required
Q1. Do you use cookies or similar technologies to store or gain access to information about users of your website?		
Q2. If yes, how do you provide information about the cookies to the user and obtain their consent?		

3 (j) Human Rights Act 1998

Question	Response	Further action if required
Q1. Does the project involve any intrusion in to the private and family life of individuals? <i>I.e. monitoring, surveillance or recording activities</i>	No	
Q2. Can any such intrusion be justified? <i>Legal requirement, public safety, protection of the rights and freedoms of others.</i>		

Signed:



Date: 01/09/2023

Name: Joanne O'Hara

Position: Cluster Operations Manager

You should now pass this form to your school Data Protection Lead for review.



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Step 4: This section should be filled in by the school Data Protection Lead**Risk of harm to data subjects /school / United Learning** NONE LOW MEDIUM **HIGH**

A **HIGH** risk is one where it is more likely than not that the processing will cause serious harm. In such circumstances, a more robust Impact Assessment should be conducted in consultation with the Group Data Protection Officer's team and possibly involving consultation with data subjects and other stakeholders: processing should not begin until this is completed.

Detail the reasons why you have come to this conclusion.

Low Risk –
 School follows the CCTV Policy
 CCTV is regularly maintained
 Only trained staff view and access recordings
 Privacy Policy includes the use of CCTV

Integrate the DPIA outcomes into the project: document any actions that need to be taken.

Examples might include revisions to one or more privacy notices (either to improve the transparency of the statement or to include new data processing not referred to previously) and/or revisions to data sharing/data processing agreements.

Action	Responsibility

Any actions here MUST be reviewed and checked for implementation within one month of the date below.

Recommendations for business process enhancements

Examples might include: changes to school processes, review of document storage, training or awareness-raising.

Any recommendations here MUST be considered and responded to within two months of the date below.



Section 5: receipt & review by the Group Data Protection Officer's team

Comments

Signed:

Date:

Name:

Section 6: Agreed review date.

The processing activities documented in this DPIA will be reviewed to ensure that they continue to reflect the information documented above on **[enter date]**.

