

Pegswood Primary School



CCTV Impact Assessment Policy March 2020

Created by: A Waterfield & S Kennedy

Date: March 2020

Approved by Governors: _____

Date: 19/3/2020

Headteacher: _____

Date: 27/3/2020

Review Date: March 2021

Use of surveillance CCTV in schools: impact assessments

Any school that employs surveillance CCTV for whatever purposes on its campus must comply with all statutory regulations covering its use, as enshrined in the General Data Protection Regulations (GDPR) which has entirely replaced the previous Data Protection Act (DPA) making changes to many existing data protection rules and regulations that schools, academies and other educational establishments adhered to under the DPA, the Human Rights Act 1998 and in certain circumstances, the Regulation of Investigatory Powers Act 2000. There are specific requirements that refer chiefly, but not exhaustively, to the installation of CCTV equipment and its employment, as well to the collection, analysis, dissemination and storage of data collected, that the school must address and be seen to be implementing actively.

A school is required to have a detailed policy covering every aspect of the use of surveillance CCTV and the data collected on its premises, and must have an appointed data controlling officer, preferably from the senior management team, to oversee and control all aspects of the use of surveillance CCTV and data collected from it. Registration for the use of CCTV surveillance must be maintained with the Office of the Information Commissioner, from where a suitable code of practice on its use can also be obtained.

An impact assessment can be a very useful method of detailing important aspects of the use of surveillance CCTV in a school and how it will affect those present, in particular, but not exclusively, staff and students. The impact assessment needs to address the following requirements.

- The exact purpose for the use of surveillance CCTV in each any every area of coverage.
- An assessment of the suitability for the use of CCTV over other methods considered for achieving the same or similar outcome.
- An assessment of the proportionality of the level of coverage employed, with regard to amount of equipment in use and time periods for which it is activated
- The possible/potential ways in which the data collected could be used, affecting directly or indirectly those monitored, including any restrictions on its usage, for each and every area of coverage.
- Where any/all data is stored for later possible use, the suitability of this over other methods to achieve the same information and outcomes.
- For each and every area of coverage, the identification of personnel having immediate access to the data collected through general authorisation as part of their specific duties, including the data controlling officer and other systems' monitors with general or limited authorisation on their behalf to view the data for whatever purpose.
- For each and every area of coverage, where data may be stored, how and by whom the data will be processed in any manner, and for what purpose.
- For each and every area of coverage, the identification of personnel who can gain access to any/all data collected, as an intrinsic part of their duties (only if requisite authorisation has been granted, permanently or temporarily) and where possible, indication of whether any authorised use can be made of the released data, as well as any restrictions placed upon its use by the third party.

- Detailed methods by which all personnel, whose images could be captured by an active surveillance CCTV system, will be informed of this possibility, including appropriate signs and channels through which further information can be obtained.
- Specifically, in addition to the above, if the CCTV surveillance equipment is entirely operated by an outside agency, which also controls the collection, monitoring and use of all data obtained, a clear statement to this effect with full contact details of the agency.

It is further considered desirable that for every instance where those present could possibly be captured on surveillance CCTV, an assessment will be made concerning the individual's right to privacy, limited or otherwise and the impact on their ability to perform in their most effective and personally comfortable way; this including both staff and students, but not exclusively. Whilst this assessment is bound to have a significant subjective element, it should nevertheless be considered as an important part of the overall statement.

Impact assessment for use of surveillance CCTV in schools

A. This is an impact assessment statement for the use of surveillance CCTV at:

Pegswood Primary School

Longhirst Road, Pegswood, Morpeth, NE61 6XG

This assessment has been carried out by:

Sarah Kennedy

School Business Manager

The assessment is effective from March 2019 to March 2022

The data controlling officer for the school is:

Andrew Waterfield

Pegswood Primary School

01670 512834

admin@pegswood.northumberland.sch.uk

Registration with the Office of the Information Commissioner last updated on 9 / 10 / 2019

Checks for serviceability of CCTV systems and clarity of images last completed on 11/ 2019

B. Areas on the school campus covered by installed surveillance CCTV, whether active or not. (At least this should include all outside areas on the school grounds, all entrances, all internal communal areas and all teaching units, individually stated where possible. Total number of possible operative cameras should be included.)

CAMERA AREA	No.
LKS2 playground – continuous	1
UKS2 playground – continuous	1
Front playground facing towards entrance – continuous	1
Front of school overlooking the staff carpark entrance- continuous	1

(A separate sheet should be completed for each area, giving precise details of the use of surveillance CCTV and the data collected from that area. It may be adequate to group together some areas where the information to be recorded is entirely or partially common, without loss of specific reference.)

Data collected during school hours will be used for safeguarding purposes to ensure that only authorised personnel enter the school site. It will be reviewed by authorised personnel and be destroyed after 30 days.

Data collected outside of school hours will be used to identify intruders should damage be caused anywhere on site. It will be reviewed by the School Business Support Officer destroyed after 30 days.

C. Impact assessment for use of CCTV in LKS2 playground, UKS2 playground, front playground and staff car park entrance. Purpose(s) for use of surveillance CCTV:

To identify intruders should damage be caused on site.

Advantages of use of CCTV over other possible methods:

CCTV enables us to identify intruders when school is closed and the site is unoccupied.

Assessment of amount of equipment used and time equipment is active:

1 camera only on each location – active 24 hours a day

Specific ways in which data collected will be used, including restrictions:

It will be reviewed as necessary by the Headteacher, Deputy Headteacher, School Business Manager, Site Manager (Maintenance) and Site Manager (Security) should the Headteacher (the Data Controller) deem it necessary.

For stored data, the method used, the maximum length of time of storage, and how the data might be used:

If it is deemed necessary to store data it will be stored on the hard drive and not on a removable device. Once the appropriate authorities have taken possession of the images in line with GDPR they will be deleted within 30 days or immediately, whichever is the soonest.

All personnel having immediate access to data collected and stored, as part of specific duties:
(Included are any servicing company's personnel with general access)

Headteacher
Deputy Headteacher
School Business Manager
Site Manager (Maintenance)
Site Manager (Security)
Chubb Limited representative

Details of how data may be processed, by whom and what purpose(s):

Data will be viewed by any of the above in conjunction with the police authority in order to aid in the identification of intruders should there be damage to or theft from any part of the site in or out of school hours.

Details of further personnel who may gain temporary access to data as part of their duties:

Nil

Methods of notification of the presence of surveillance CCTV and other information channels:

Signage at pedestrian and vehicular entrance to school.

Details of all method(s) by which images, or collected data, from CCTV may be streamed to any outside agency or other parties, if relevant. Restrictions on access are also included:

Neither images nor collected data will be streamed to any other outside agency or party.

Where an outside agency is entirely responsible for the operation and control of the CCTV equipment, its monitoring and the collection and use of data collected, all relevant and necessary details:

N/A

Assessment of any possible impact of CCTV surveillance on the right to privacy, performance or general well-being of any individuals:

No impact

Other relevant information: