

# CCTV Privacy Impact Assessment

## Low Ash Primary School



<b>Approved by:</b>	The Governing Body	<b>Date</b> 12.10.22
<b>Last reviewed on:</b>	20.11.19	
<b>Next review due by:</b>	Autumn Term 2025	

## CCTV Privacy Impact Assessment for Low Ash Primary School

<b>Name of member of staff responsible for the system</b>	Elizabeth Medhurst Fiona Meer Jason Byrne
<b>Position</b>	Co-Headteachers Site Manager
<b>Name of person carrying out the assessment</b>	Sharon Giedrojt
<b>Position</b>	Business Manager
<b>Assessment Date</b>	22.9.22
<b>Review Date</b>	Autumn 2025
<b>Description of the CCTV system</b>	
<p><i>Include here roughly where the cameras &amp; 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.</i></p> <p>The data recorder is stored in the main office. The Site Manager or SLT must satisfy themselves over the identity of any other visitors to the main office and the purpose of the visit. Where any doubt exists access will be refused</p> <p>The viewing screens are located in the main school office.</p> <p>Access to the CCTV facilities will be strictly limited to the SLT, the Site Manager.</p> <p>Unless an immediate response to events is required, staff in the CCTV main office must not direct cameras at an individual or a specific group of individuals.</p> <p>The CCTV system will be operated 24 hours each day, every day of the year.</p> <p>The cameras recording images are located in the following areas.</p> <p>External</p> <ul style="list-style-type: none"> <li>4 at the front of school</li> <li>5 at the rear of school</li> </ul> <p>Internal cameras</p> <ul style="list-style-type: none"> <li>1 on east corridor</li> <li>1 on west corridor</li> <li>2 on south corridor</li> <li>1 on key stage 1 corridor</li> </ul>	

1 at the year 6 entrance

### **Purposes of the CCTV system**

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

Low Ash Primary School uses closed circuit television (CCTV) and the images produced to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, to prevent loss or damage to school property and to prevent or detect crime.

### **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 are in place these include a door entry system. The rear of the school where the playground and fields are situated are secure. This does not remove the need to record images inside the building to safeguard our staff, students and visitors.

### **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 a safe environment for students, staff and visitors, 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 school site could be captured on the CCTV system, this could include; pupils, parents, staff, visitors, contractors etc.

**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*

Site Manager – to investigate who has caused damage to the school building

SLT – to monitor the safety of students, staff and visitors

**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 front and rear of school.

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 request from the school.**

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 or Headteacher.

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 the main office, the site managers computer and SLT computers. This is only accessed by the SLT and Site Manager. There is no access to images at the recorder.

Access to the software to view the images , there is a live feed is in the main office and recorded access is available on the site manager and SLT computers.

### **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 after 3 days when the images are recorded over.

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 SLT after the investigation is complete. Such recorded images will stored in a secure folder only accessible to SLT.

**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.

One external camera that captures images of our staff car park does capture images of the public that walk past but this is located at least 25 meters from the camera and it would not be possible to positively identify the person.

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 Executive Headteacher or Head of School.

**Previous assessments**

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

No previous assessments have been completed.

**Other relevant information**

Comprehensive information can be found in addition to this document in the school's CCTV Policy (Dated September 2018).

**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 2017) 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**

<b>Name</b>	Sharon Giedrojt – Business Manager
<b>Signed</b>	<i>S Giedrojt</i>
<b>Dated</b>	22.9.22
<b>Further actions required</b>	
<i>State what actions are required before the system can be put in place or remain in place</i>	
None	

Signed by The Chair of Governors – E Lister

<b>Signed</b>	
<b>Dated</b>	