

Submitting Controller Details

Name of controller	Kingsway Primary School
Reason for DPIA	Implementation of CCTV
Name of DPO	Daniel Parker GCC

Step 1: Project Description

<p>Explain broadly what project aims to achieve and what type of processing it involves.</p> <p>CCTV to be implemented as we take our responsibility towards the safety of staff, visitors and pupils very seriously. To that end, we use surveillance cameras to monitor any instances of aggression or physical damage to our schools and its members.</p>
--

Step 2: Processing

<p>About the handling of the data – How will you collect, use, share, store and delete data?</p>
<p>Data (images) will be captured through the cameras and this will be stored on the CCTV hard drives for a maximum of 2 weeks during term time. However, during the summer break the storage of images will be increased to 2 months. Only authorised personnel will have access to the images that are stored.</p>
<p>About the data – Quantity of data, timeframe, and type. reference special category data.</p>
<p>The data will be stored through the use of cameras and images will be displayed securely on a screen that is strategically placed in the school office.</p>
<p>About the data subjects – Expectations and control? Reference vulnerable groups and existing concerns over current processing.</p>
<p>Only authorised personnel will have access rights to retrieve footage from the hard drives. The ‘live’ screen will be strategically placed in the school office, therefore, visitors and pupils will not be able to see the live screen. A log of recording requests will be maintained to ensure that the school has a clear record of what recordings have been retained, how long for, where they are kept, who has access to them and the security of the recordings. This will be updated when recordings are no longer required and are deleted from the system. This will also be maintained for any recordings that are shared externally – for example, with the police.</p>
<p>Identify benefits of the processing.</p>
<p>We use surveillance cameras to monitor any instances of aggression or physical damage to our schools and its members.</p>

Step 3: Consultation

<p>How will you consult with relevant stakeholders, or why not appropriate?</p>
<p>Governors have been consulted with.</p>

Step 4: Compliance Consideration

<p>Describe compliance and proportionality measures.</p>
--

Ensure the data is only retained for the necessary period of time. The school reserves the right to deny access to imagery/footage if it deems that this could cause harm to any individual. The system will also comply with all relevant legislation and guidance as laid out in the school's CCTV policy.

Step 5: Identify and Assess Risks

Describe source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of harm L/M/H	Severity of harm L/M/H	Overall risk L/M/H
Images Personal Identity	M M	M M	M M

Step 6: Identify Measures to Reduce Risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in Step 5.				
Risk	Options to reduce or eliminate risk	Risk Eliminated, Reduced, Accepted.	Residual risk L/M/H	Measure approved Yes / No
Live screen visible to visitors/pupils	Live screen situated in a strategic position that stops visitors and pupils from seeing the screen	E	L	Y
Unauthorised access to footage	Only authorised personnel to be provided with CCTV usage training (recovery of images)	E	L	Y
Storage of images not within the retention period	The CCTV company to set and monitor the retention periods. The school to liaise with the CCTV company to ensure these are adhered to.	E	L	Y
Access granted to individuals to see footage	Authorised staff to check with Head and/or DPO before agreeing to show any individual CCTV footage. Clear communication to authorised personnel.	E	M	Y

Step 7: Sign Off and Record Outcomes

Item	Name/position/date	Notes
Measures approved by:	Lee Pajak Head Teacher	Note actions and responsibilities for compliance with DPIA
Residual risks approved by:	Claire Smith (School Business Manager)	Consult with ICO before going ahead if High risk remains
DPO advice provided:	SchoolPro TLC	
DPO advice: Ensure all authorized personnel have been communicated with clearly. The CCTV company should have provided the relevant compliance documentation and regularly monitor the retention settings.		
DPO advice accepted or overruled:	Accepted	If overruled, give reasons
Comments:		
Consultation responses reviewed by:	NA	If decision making is not in line with consultation, give reasons
Comments:		
This DPIA will kept under review by:	Lee Pajak	Annually
Additional Notes:		