



**SURVEILLANCE CAMERA  
COMMISSIONER**

**ico.**  
Information Commissioner's Office

**Data protection impact assessments**  
template for carrying out a data  
protection impact assessment on  
surveillance camera systems

**St. Brigid's School, Denbigh**



**Project name: CCTV**

**Data controller(s): St. Brigid's School, Denbigh**

**This DPIA template should be completed with reference to the guidance provided by the Surveillance Camera Commissioner and the ICO. It will help you to identify whether the use of surveillance cameras is appropriate for the problem you wish to address, assess the risks attached to your project and form a record of your decision making.**

**1. Identify why your deployment of surveillance cameras requires a DPIA<sup>1</sup>:**

- |                                                           |                                                                   |
|-----------------------------------------------------------|-------------------------------------------------------------------|
| <input type="checkbox"/> Systematic & extensive profiling | <input type="checkbox"/> Large scale use of sensitive data        |
| <input checked="" type="checkbox"/> Public monitoring     | <input type="checkbox"/> Innovative technology                    |
| <input type="checkbox"/> Denial of service                | <input type="checkbox"/> Biometrics                               |
| <input type="checkbox"/> Data matching                    | <input type="checkbox"/> Invisible processing                     |
| <input type="checkbox"/> Tracking                         | <input type="checkbox"/> Targeting children / vulnerable adults   |
| <input type="checkbox"/> Risk of harm                     | <input type="checkbox"/> Special category / criminal offence data |
| <input type="checkbox"/> Automated decision-making        | <input type="checkbox"/> Other (please specify)                   |

**2. What are the timescales and status of your surveillance camera deployment?** Is this a proposal for a new deployment, or the expansion of an existing surveillance camera system? Which data protection regime will you be processing under (i.e. DPA 2018 or the GDPR)?

This is a new deployment of surveillance cameras within the school premises.  
Personal data is processed in accordance with the GDPR and Data Protection Act 2018.

**Describe the processing**

**3. Where do you need to use a surveillance camera system and what are you trying to achieve?**

Set out the **context** and **purposes** of the proposed surveillance cameras or the reasons for expanding an existing system. Provide evidence, where possible, including for example: crime statistics over an appropriate time period; housing and community issues, etc.

Surveillance cameras cover outside spaces/grounds and school entrances.  
The system is required for the following overall operational reasons:  
To provide a safe and secure environment for pupils, staff and visitors.  
To increase personal safety and reduce the fear of crime  
To protect school buildings and assets  
To help prevent, detect and investigate crime

In June 2020, a suspected deliberate act of vandalism caused damage to school property, costing approximately £100,000 in remedial works. The installation of CCTV is an insurance requirement following this incident.

<sup>1</sup> <https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/data-protection-impact-assessments-dpias/when-do-we-need-to-do-a-dpia/>

**4. Whose personal data will you be processing, and over what area?** Set out the **nature** and **scope** of the personal data you will be processing. Who are the data subjects, and what kind of information will you be collecting about them? Do they include children or vulnerable groups, and what is the scale and duration of the processing?

The CCTV processes the personal data of pupils, staff and visitors to the school premises. The system will provide video images from 8 fixed based cameras which will be transmitted to a digital recorder system, housed within the secure ICT server room. CCTV is operational 24 hours a day, 7 days a week.

**5. Who will be making decisions about the uses of the system and which other parties are likely to be involved?** Will you be the sole user of the data being processed or will you be sharing it with other organisations or agencies? Record any other parties you would disclose the data to, for what purposes, and any relevant data sharing agreements. Note that if you are processing for more than one purpose you may need to conduct separate DPIAs.

The school is the data controller and will make decisions about the uses of the system for the purposes set out in the CCTV policy and this DPIA. Transmitted images may be viewed live by the Headteacher, Business & Finance manger, Facilities Support Officer and ICT Systems Engineers. In some circumstances, the information may be shared with the Senior Leadership Team, Governors and the Police for investigaiton and enforcement purposes.

**6. How is information collected? (tick multiple options if necessary)**

- |                                                            |                                                           |
|------------------------------------------------------------|-----------------------------------------------------------|
| <input checked="" type="checkbox"/> Fixed CCTV (networked) | <input type="checkbox"/> Body Worn Video                  |
| <input type="checkbox"/> ANPR                              | <input type="checkbox"/> Unmanned aerial systems (drones) |
| <input type="checkbox"/> Stand-alone cameras               | <input type="checkbox"/> Redeployable CCTV                |
| <input type="checkbox"/> Other (please specify)            |                                                           |

**7. Set out the information flow, from initial capture to eventual destruction. You may want to insert or attach a diagram.** Indicate whether it will include audio data; the form of transmission; the presence of live monitoring or use of watchlists; whether data will be recorded; whether any integrated surveillance technologies such as automatic facial recognition are used; if there is auto deletion after the retention period. You may have additional points to add that affect the assessment.



### 8. Does the system's technology enable recording?

Yes       No

If recording is enabled, state where it is undertaken (no need to stipulate address, just Local Authority CCTV Control room or on-site will suffice for stand-alone camera or BWV), and whether it also enables audio recording.

On-site secure IT Server Room

### 9. If data is being disclosed, how will this be done?

- Only by on-site visiting
- Copies of footage released (detail method below, e.g. encrypted digital media, via courier, etc)
- Off-site from remote server
- Other (please specify)

Data may be disclosed in accordance with the School's Data Protection and CCTV policies. It is intended that disclosure will only be by on-site visiting. If, however, there is a legal requirement to provide copies of video images, this will be on encrypted digital media.

### 10. How is the information used? (tick multiple options if necessary)

- Monitored in real time to detect and respond to unlawful activities
- Monitored in real time to track suspicious persons/activity
- Compared with reference data of persons of interest through processing of biometric data, such as facial recognition.
- Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software
- Linked to sensor technology
- Used to search for vulnerable persons
- Used to search for wanted persons
- Recorded data disclosed to authorised agencies to support post incident investigation, including law enforcement agencies
- Recorded data disclosed to authorised agencies to provide intelligence
- Other (please specify)

The system will be monitored in real time, locally or remotely to detect and respond to unlawful or suspicious activity. Where unlawful and/or suspicious activity is detected, recording may be kept whilst or until a determination is made as to whether, or not, the recorded data is required for child protection, police or other legal purposes. If not required the recording will be permanently deleted.

## Consultation

### 11. Record the stakeholders and data subjects you have consulted about the deployment, together with the outcomes of your engagement.

| <b>Stakeholder consulted</b> | <b>Consultation method</b>                  | <b>Views raised</b>                                                                                                  | <b>Measures taken</b>              |
|------------------------------|---------------------------------------------|----------------------------------------------------------------------------------------------------------------------|------------------------------------|
| Schools DPO                  | Meeting                                     | Joint review of proposals                                                                                            | Joint agreement on this document   |
| Trustees                     | Written report to meeting of Trustees       | Needed for protection of Trust assets, particularly after major kerosene leak and stipulated insurance requirements. | Agreement for installation of CCTV |
| Governors                    | Written report to meeting of Governing Body | Agreed with views of Trustees. Also useful for potential child protection issues.                                    | Agreement for installation of CCTV |
| Senior Leadership Team       | Written report to SLT                       | Agreed with views expressed by both Trustees and Governors                                                           | Agreement for installation of CCTV |
|                              |                                             |                                                                                                                      |                                    |

## Consider necessity and proportionality

**12. What is your lawful basis for using the surveillance camera system?** Explain the rationale for your chosen lawful basis under the relevant data protection legislation. Consider whether you will be processing special categories of data.

Under the GDPR the lawful basis we rely on for processing will usually be legitimate interests. It is within the legitimate interests of the school to ensure:  
The safeguarding of pupils, staff and visitors  
The protection of school buildings and assets

**13. How will you inform people that they are under surveillance and ensure that they are provided with relevant information?** State what privacy notices will be made available and your approach to making more detailed information available. Consider whether data subjects would reasonably expect to be under surveillance in this context.

The School's CCTV Policy & Procedure, including location of cameras will be published in the school's website and a copy made available upon request.  
The school's privacy notices will be updated to include processing via CCTV  
Signs will be placed at main entrances to inform people that CCTV is in operation and will include a point of contact for further information. Signs will also be placed where cameras are sited.

**14. How will you ensure that the surveillance is limited to its lawful purposes and the minimum data that is necessary for those purposes?** Explain the adequacy and relevance of the data you will be processing and how it is limited to the purposes for which the surveillance camera system will be deployed. How will you know if it is delivering the benefits it has been deployed for?

The requirement for CCTV and also CCTV policy & procedures will be reviewed at regular intervals. Further DPIA's will be carried out where there is a change to the type of processing carried out. Data will only be retained for as long as is necessary for the stated purposes and as outlined in the policy & procedures.

**15. How long is data stored? (please state and explain the retention period)**

The data will be held for 28 days then automatically re-written. Where it is necessary for a specific purpose to retain images for a longer period, this will be subject to regular review.

## 16. Retention Procedure

- Data automatically deleted after retention period
- System operator required to initiate deletion
- Under certain circumstances authorised persons may override the retention period, e.g. retained for prosecution agency (please explain your procedure)

The Head Teacher will have authority to override the retention period.

**17. How will you ensure the security and integrity of the data?** How is the data processed in a manner that ensures appropriate security, protection against unauthorised or unlawful processing and against accidental loss, destruction or damage? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

The school will ensure appropriate security measures are in place to prevent the unlawful disclosure of images. This will include:

- Access to recording systems and retained images will be restricted to specified members of staff
- The CCTV system will be password protected;
- Restriction of the ability to make copies to specified members of staff
- Exported recordings for the police are encrypted
- A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the school

**18. How will you respond to any subject access requests, the exercise of any other rights of data subjects, complaints or requests for information?** Explain how you will provide for relevant data subject rights conferred under the legislation. You must have procedures in place to respond to requests for camera footage in which a subject appears, and to respond to any other request to meet data protection rights and obligations.

When a request is made a specified member of staff will review the CCTV footage. If the footage contains only the individual making the request, they may be permitted to view the footage. Where footage includes others, advice on disclosure will be sought from the DPO. A log will be kept of all disclosures.



**19. What other less intrusive solutions have been considered?** You need to consider other options prior to any decision to use surveillance camera systems. For example, could better lighting or improved physical security measures adequately mitigate the risk? Does the camera operation need to be continuous? Where you have considered alternative approaches, provide your reasons for not relying on them and opting to use surveillance cameras as specified.

It is proposed to limit the use of CCTV to what is necessary for insurance purposes and will be the least intrusive. There are no alternative options to meet insurance requirements. There is no current intention to install CCTV inside school buildings.

**20. Is there a written policy specifying the following? (tick multiple boxes if applicable)**

The agencies that are granted access

How information is disclosed

How information is handled

Are these procedures made public?       Yes       No

Are there auditing mechanisms?       Yes       No

If so, please specify what is audited and how often (e.g. disclosure, production, accessed, handled, received, stored information)

The school will be subject to ad hoc audits by Denbighshire County Council Audit Services.

## Identify the risks

Identify and evaluate the inherent risks to the rights and freedoms of individuals relating to this surveillance camera system. Consider, for example, how long will recordings be retained? Will they be shared? What are the expectations of those under surveillance and impact on their behaviour, level of intrusion into their lives, effects on privacy if safeguards are not effective? Could it interfere with other human rights and freedoms such as those of conscience and religion, expression or association. Is there a risk of function creep? Assess both the likelihood and the severity of any impact on individuals.

| <b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary. | <b>Likelihood of harm</b>                    | <b>Severity of harm</b>                           | <b>Overall risk</b>               |
|-----------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------|---------------------------------------------------|-----------------------------------|
| Positioning of CCTV cameras at entrance points to school buildings and the issue of privacy.                                                  | Remote, possible or probable<br><br>Possible | Minimal, significant or severe<br><br>Significant | Low, medium or high<br><br>Medium |
| Security breach leading to loss, unauthorised disclosure or access to personal data                                                           | Remote, possible or probable<br><br>Possible | Minimal, significant or severe<br><br>Significant | Low, medium or high<br><br>Medium |
| CCTV policies and procedures not in place leading to inconsistencies and use of system beyond the purpose for which it was intended           | Remote, possible or probable<br><br>Possible | Minimal, significant or severe<br><br>Significant | Low, medium or high<br><br>Medium |
| Training not undertaken by those using CCTV.<br>System use in breach of GDPR                                                                  | Remote, possible or probable<br><br>Possible | Minimal, significant or severe<br><br>Significant | Low, medium or high<br><br>Medium |

|                                                                     |                                              |                                                   |                                   |
|---------------------------------------------------------------------|----------------------------------------------|---------------------------------------------------|-----------------------------------|
| Non-compliance when upgrading the school's CCTV system              | Remote, possible or probable<br><br>Possible | Minimal, significant or severe<br><br>Significant | Low, medium or high<br><br>Medium |
| Housing of CCTV cameras in external locations and ingress of water. | Remote, possible or probable<br><br>Possible | Minimal, significant or severe<br><br>Significant | Low, medium or high<br><br>Medium |
| Ongoing maintenance of CCTV equipment preventing breakdowns etc.    | Remote, possible or probable<br><br>Possible | Minimal, significant or severe<br><br>Significant | Low, medium or high<br><br>Medium |

## Address the risks

Explain how the effects of privacy enhancing techniques and other features mitigate the risks you have identified. For example, have you considered earlier deletion of data or data minimisation processes, has consideration been given to the use of technical measures to limit the acquisition of images, such as privacy masking on cameras that overlook residential properties? What security features, safeguards and training will be in place to reduce any risks to data subjects. Make an assessment of residual levels of risk.

**Note that APPENDIX ONE allows you to record mitigations and safeguards particular to specific camera locations and functionality.**

| <b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk</b>                                                                                                                                                                                                        |                                           |                        |                          |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------|------------------------|--------------------------|
| <b>Options to reduce or eliminate risk</b>                                                                                                                                                                                                                                                                               | <b>Effect on risk</b>                     | <b>Residual risk</b>   | <b>Measure approved?</b> |
| <b>Positioning of CCTV cameras at entrance points to school buildings and the issue of privacy.</b><br>Cameras positioned towards open/communal spaces<br>Appropriate CCTV signage in place which conforms to industry standards.                                                                                        | Eliminated reduced<br>accepted<br>Reduced | Low medium high<br>Low | Yes                      |
| <b>Security breach leading to loss, unauthorised disclosure or access to personal data</b><br>Policy & Procedure sets out how system will be operated. This will be kept under review.<br>Access limited to number of authorised persons<br>Appropriate training provided<br>Maintenance of system                       | Eliminated reduced<br>accepted<br>Reduced | Low medium high<br>Low | Yes                      |
| <b>CCTV policies and procedures not in place leading to inconsistencies and use of system beyond the purpose for which it was intended</b><br>Policies and procedures are in place, published on the school's website, with review dates stipulated.<br>Any changes to nature and scope of processing is subject to DPIA | Eliminated reduced<br>accepted<br>Reduced | Low medium high<br>Low | Yes                      |

|                                                                                                                                                                                                  |                                               |                            |     |
|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------|----------------------------|-----|
| <b>Training not undertaken by those using CCTV.</b><br><b>System use in breach of GDPR</b><br>Ensure users aware of policy & procedures<br>Regular DP training – log kept of training undertaken | Eliminated reduced<br>accepted<br><br>Reduced | Low medium high<br><br>Low | Yes |
| <b>Non-compliance when upgrading the school's CCTV system.</b><br>Consult DPO if changes made to use of system<br>DPIA to be completed if required                                               | Eliminated reduced<br>accepted<br><br>Reduced | Low medium high<br><br>Low | Yes |
| <b>Housing of CCTV cameras in external locations and ingress of water</b><br>Use of waterproof enclosures                                                                                        | Eliminated reduced<br>accepted<br><br>Reduced | Low medium high<br><br>Low | Yes |
| <b>Ongoing maintenance of CCTV equipment preventing breakdowns etc</b><br>Maintenance provided by external IT company                                                                            | Eliminated reduced<br>accepted<br><br>Reduced | Low medium high<br><br>Low | Yes |

## Authorisation

If you have not been able to mitigate the risk then you will need to submit the DPIA to the ICO for prior consultation. [Further information](#) is on the ICO website.

| <b>Item</b>                                                  | <b>Name/date</b> | <b>Notes</b>                                                                                                                             |
|--------------------------------------------------------------|------------------|------------------------------------------------------------------------------------------------------------------------------------------|
| Measures approved by:                                        |                  | Integrate actions back into project plan, with date and responsibility for completion.                                                   |
| Residual risks approved by:                                  |                  | If you identify a high risk that you cannot mitigate adequately, you must consult the ICO before starting to capture and process images. |
| DPO advice provided by:                                      |                  | DPO should advise on compliance and whether processing can proceed.                                                                      |
| Summary of DPO advice                                        |                  |                                                                                                                                          |
| DPO advice accepted or overruled by:<br>(specify role/title) |                  | If overruled, you must explain your reasons.                                                                                             |
| Comments:                                                    |                  |                                                                                                                                          |
| Consultation responses reviewed by:                          |                  | If your decision departs from individuals' views, you must explain your reasons.                                                         |
| Comments:                                                    |                  |                                                                                                                                          |

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|                                         |  |                                                          |
|-----------------------------------------|--|----------------------------------------------------------|
| This DPIA will be kept under review by: |  | The DPO should also review ongoing compliance with DPIA. |
|-----------------------------------------|--|----------------------------------------------------------|

## APPENDIX ONE

This template will help you to record the location and scope of your surveillance camera system and the steps you've taken to mitigate risks particular to each location.

**Location:** Each system operator/owner should list and categorise the different areas covered by surveillance on their system. Examples are provided below.

| Location of camera                   | Camera types used | Amount | Recording  | Monitoring                                       | Assessment of use of equipment (mitigations or justifications) |
|--------------------------------------|-------------------|--------|------------|--------------------------------------------------|----------------------------------------------------------------|
| Front of Main Building               | Night Vision      | 1      | Continuous | Approach to front door                           | Insurance requirement                                          |
| Front of Main Building               | Night Vision      | 1      | Continuous | Approach to front car park                       | Insurance requirement.                                         |
| Front of Main Building               | Night Vision      | 1      | Continuous | ICT Suite, CCF mobiles & observatory             | Insurance requirement.                                         |
| Above pupil entrance (hall corridor) | Night Vision      | 1      | Continuous | The pupil entrance                               | Insurance requirement.                                         |
| Hall                                 | Night Vision      | 1      | Continuous | Side entrance (to rear car park)                 | Insurance requirement.                                         |
| Music Room                           | Night Vision      | 1      | Contnuous  | Over rear playground and Oil tank                | Insurance requirement.                                         |
| Rear of main building                | Night Vision      | 1      | Continuous | Rear playground, rear entrance and science block | Insurance requirement.                                         |
| Rear of main building                | Night Vision      | 1      | Continuous | Outside toilet entrances and Gas Tank            | Insurance requirement.                                         |
|                                      |                   |        |            |                                                  |                                                                |
|                                      |                   |        |            |                                                  |                                                                |
|                                      |                   |        |            |                                                  |                                                                |
|                                      |                   |        |            |                                                  |                                                                |
|                                      |                   |        |            |                                                  |                                                                |
|                                      |                   |        |            |                                                  |                                                                |
|                                      |                   |        |            |                                                  |                                                                |



## APPENDIX TWO: STEPS IN CARRYING OUT A DPIA



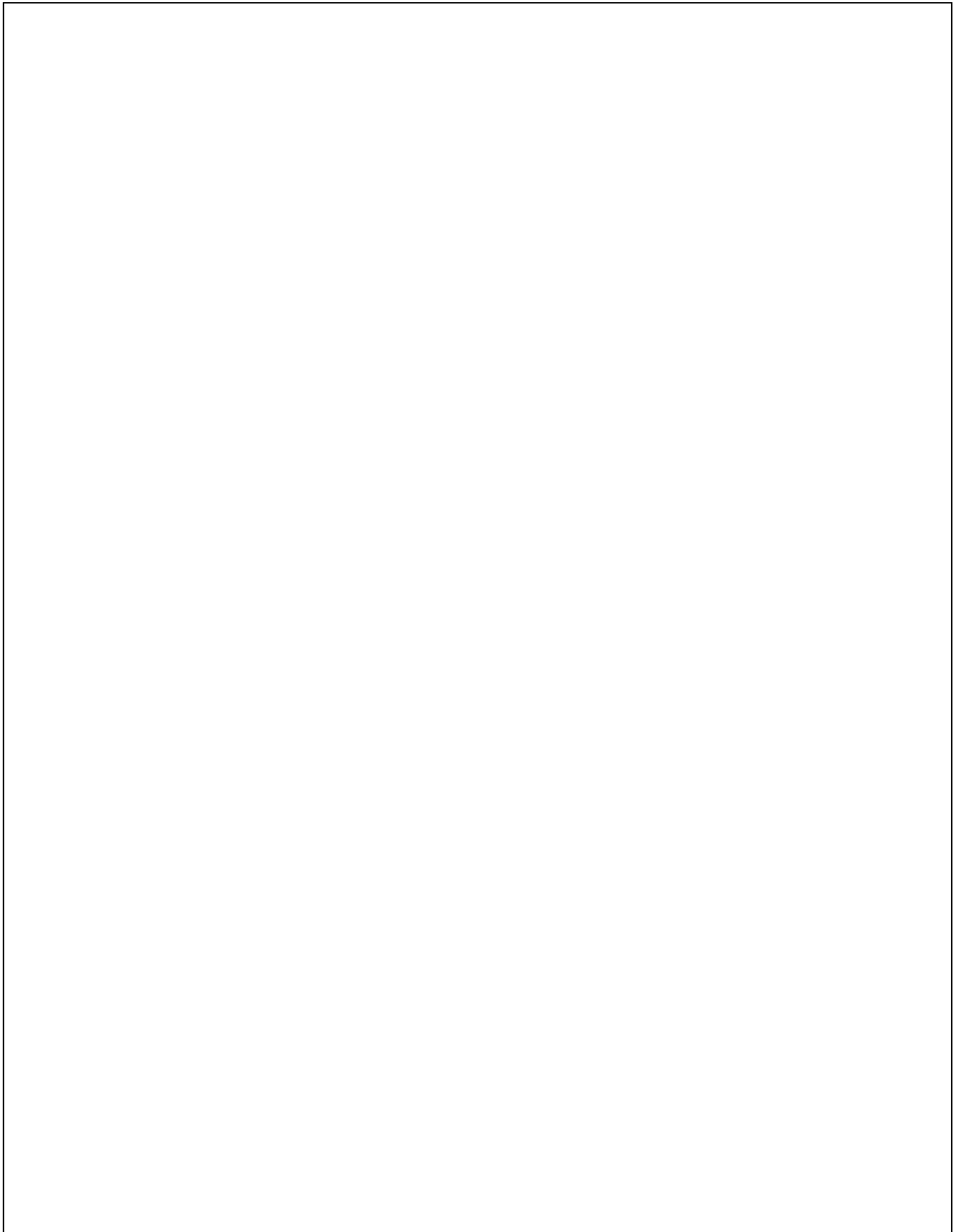
## APPENDIX THREE: DATA PROTECTION RISK ASSESSMENT MATRIX

Use this risk matrix to determine your score. This will highlight the risk factors associated with each site or functionality.

### Matrix Example:

|                 | Camera Types (low number low impact – High number, High Impact) |        |        |        |        |        |        |        |        |
|-----------------|-----------------------------------------------------------------|--------|--------|--------|--------|--------|--------|--------|--------|
|                 | →                                                               |        |        |        |        |        |        |        |        |
| Location        | Green                                                           | Green  | Green  | Orange | Orange | Orange | Orange | Orange | Orange |
| Types           | Green                                                           | Green  | Green  | Orange | Orange | Orange | Orange | Orange | Orange |
| A (low impact)  | Green                                                           | Green  | Green  | Orange | Orange | Orange | Orange | Orange | Orange |
| Z (high impact) | Orange                                                          | Orange | Orange | Orange | Red    | Red    | Red    | Red    | Red    |
|                 | Orange                                                          | Orange | Orange | Orange | Red    | Red    | Red    | Red    | Red    |
|                 | Orange                                                          | Orange | Orange | Orange | Red    | Red    | Red    | Red    | Red    |
|                 | Orange                                                          | Orange | Orange | Orange | Red    | Red    | Red    | Red    | Red    |
|                 | Orange                                                          | Orange | Orange | Orange | Red    | Red    | Red    | Red    | Red    |

## NOTES

A large, empty rectangular box with a thin black border, intended for handwritten or typed notes. It occupies the majority of the page's vertical space.

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