



CCTV Installation – Data Protection Impact Assessment

Ermysted's Grammar School

The Governing Body of Ermysted's Grammar School (the 'School') reviewed and approved this assessment on [XX March 2020].

This Data Protection Impact Assessment was prepared in line with guidance from the Information Commissioner's Office to identify and minimise the risks of the project.

Data controller

Ermysted's Grammar School is a **Data Controller** as defined by Article 4 (7) of the General Data Protection Regulation (GDPR). This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The school has appointed Veritau Ltd to be its **Data Protection Officer (DPO)**. The role of the DPO is to ensure that the school is compliant with GDPR and to oversee data protection procedures. Veritau's contact details are:

Information Governance
Veritau Ltd
County Hall
Racecourse Lane
Northallerton
DL7 8AL
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01609 53 2526

Project Brief

Ermysted's Grammar School is replacing and extending the existing external CCTV cameras mounted on some of the School's buildings to establish an integrated network of cameras in order to enhance the monitoring of activity around the School site focused on:

- improving site security;
- monitoring pupils' behaviour;
- recording activities for health and safety purposes.

The cameras will be used to record images which might, for example:

- provide supplementary information concerning peoples' arrival on and departure from the School site;
- provide evidence of intrusion, theft or vandalism outside the School's normal periods of operation;
- be offered in support of an insurance claim;
- provide evidence of pupils' actions and behaviour to substantiate or repudiate suggestions or allegations of abuse, fighting, vandalism etc;
- provide evidence of factors underlying any accidents.

Access to any images captured will be restricted in accordance with the School's CCTV Policy.

Key features of and extracts from that Policy are included in this Impact Assessment for ease of reference but the whole Policy may also be reviewed via the School's website.

Data processing

Images will be captured using a number of cameras located on buildings around the School site. These have been positioned and have ranges of projection which are designed to provide comprehensive coverage of the outside of the buildings, entry and exit points, communal external areas and the entrances to the School from the driveways leading up from Gargrave Road.

The direction and scope of coverage provided by the cameras are focused within the School site. The system offers the ability to pixelate and exclude any images which might extend outside this area through incorrect alignment.

The system can only be accessed through the desktop computers in the offices of the IT Manager and the Site Manager. Access to the images will be limited to the Headmaster or to authorised senior members of staff acting on his behalf.

The cameras do not record audio and live images from the cameras are not routinely monitored. Recorded data will not be retained for longer than necessary. All images will be routinely deleted after one week, unless required for on-going investigations or prosecutions.

Images will be recorded and may be viewed in order to:

- protect pupils, staff and visitors;
- increase personal safety and reduce the fear of crime;
- protect the school buildings and assets;
- support the police in preventing and detecting crime;
- assist in identifying, apprehending and prosecuting offenders;
- assist in the safeguarding of children in and around the site;
- assist with the objectives outlined below.

Necessity and proportionality

The decision to improve the coverage and functionality of the School's CCTV network was made in order to help address:

- unauthorised access to parts of the School site by third parties outside the School's normal hours and days of operation;
- several incidents of vandalism and theft (most particularly the repeated theft of lead from roof areas);
- behaviour of pupils.

The upgrading and extension of monitoring capabilities is considered to be a legitimate and proportionate response to tackling these problems.

Images captured or retained from the CCTV network will not be stored or backed up outside the School site other than in the possible circumstance of specific release for legal reasons as set out in the CCTV Policy.

Risk assessment

The risk of adverse impact on individuals (staff, pupils, parents or visitors) from the recoding of images is considered to be minimal.

The fundamental objective of the new installation is to reduce the risks which might arise to individuals or property from safeguarding concerns, misbehaviour, safety issues or intrusion.

Images will not be monitored on a routine basis and will not be available for viewing unless authorised for specific reasons by the Headmaster in accordance with the School's existing CCTV Policy.

Measures to reduce risk

Images captured will not be released or used outside the School other than in accordance with the existing CCTV Policy and following the procedures outlined therein, for example, to ensure their admissibility in any legal proceedings.

Processes are already in place (as set out in detail in that Policy) to ensure an appropriate response if required, for example, by the police, or in response to a legitimate Subject Access request.

Consultation process

The consultation was opened on 28 February 2020 and ran for two weeks closing on 12 March 2020.

The consultation was circulated to parents of the School's pupils, the School's staff and was also published on the School's website.

Sign off

Any responses to the consultation will be reviewed and considered.

If appropriate measures may be taken to respond to any concerns that might be raised.

However, it should be emphasised that the assessment concerns the upgrading of an existing system which is supported and underpinned by an established Policy. The use of CCTV at the School has been approved previously and this project is designed to improve its coverage and value rather than introducing the capture of images for the first time. The practical use of CCTV is already controlled by an established and approved set of operating parameters and Policy.

The School's Governing Board will ratify the implementation of the new CCTV network taking account of any adjustments or changes that it considers appropriate prior to the system being made operational.