

# Oxford Diocesan Schools Trust

St Mary's Convent, Denchworth Road, Wantage, Oxfordshire OX12 9AU



## Data Protection Impact Assessment CCTV Worked Example

### Introduction

This template should be used to record any data protection impact assessments (DPIAs) undertaken in ODST schools or by the Trust.

A DPIA should be carried out for any processing of personal data that is considered high risk. A DPIA should also be undertaken at the start of any major project involving the use of personal data, or if significant changes are being made to an existing process.

This template is based on the Information Commissioner's Office (ICO) example template and follows the process set out in the ICO's guidance. To help assess the level of risk, a risk assessment methodology is available from ODST, along with some examples of possible risk.

If you have any queries whilst carrying out a DPIA, please contact the Trust's Data Protection Officer:

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### Document Control

Version	Date	Author	Summary of Changes	Approver	Approval Date
1	January 2022	Headteacher	Initial document	Chair of Governors	January 2022

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<b>Step 1: Summary of Initiative/Project</b>	
<b>Describe the scope of the initiative/project</b> e.g., aims and objectives, business/educational case, duration, reach, visibility outside school/trust	
<p>The school has had CCTV fitted due to 4 break-ins in the last year.</p> <p>CCTV is operational outside the school buildings and runs continuously for 30 days before data is overwritten.</p> <p>The data being processed consists of video images from around the school (Playground areas, front of school and courtyard areas).</p> <p>Video images can also be captured as photo stills. Both video and images can be downloaded onto a memory stick when necessary. (The memory stick should be encrypted and only used if there is no alternative.)</p>	
<b>Status of Initiative/Project</b> describe the current phase of development /implementation of the initiative/project. If the DPIA is retrospective describe why it is being carried out	
<b>Step 2: Description of the processing</b>	
<b>Nature of the processing</b>	
<b>Method(s) of collection</b> e.g., online or paper-based forms completed by data subjects or from other sources	CCTV capturing visual images. The video recordings run continuously for 30 days before automatically being overwritten.

<b>Source(s) of the personal data being processed</b> if from third party sources describe them	Visual images. They are stored on a DVD recorder which is kept in a locked cupboard.
<b>Processing activities</b> - how will data be used (processed) after collection?	Data will be viewed if there is a significant need to do so. It will only be shared with the police following any criminal incident that occurs.
<b>Scope of data sharing with third parties</b> - you may want to refer to a flow diagram	Data may need to be shared as part of any subject access requests, if the requestor wants CCTV images included
<b>Scope of the processing</b>	
<b>Categories of personal data</b> - identify each category of personal data processed to include any special category data and information relating to criminal convictions and offences	Visual images only.
<b>Categories of data subject</b> e.g., pupils, parents, staff, volunteers, governors, visitors, contractors	The CCTV runs continuously so pupils, staff, parents and visitors will be captured on the recordings. People who are letting the school premises will also be captured on the recordings. Trespassers will also be captured out of school hours if on the premises.
<b>Format of the personal data</b> e.g., paper records, electronic documents, management information systems, online 'cloud' files etc	Visual images only.
<b>Storage location</b> e.g., school-based servers, trust-based servers, cloud-hosted services in UK, EEA or elsewhere, locked filing cabinets	Images stored on a DVD recorder which is kept in a locked cupboard and accessible by the Headteacher.
<b>Duration and frequency of processing</b> in relation to nature of	Images will only be accessed by the Headteacher if there is a break in or other criminal behaviour at the

the initiative or relationship with the data subject	school or if there is a subject access request
<b>Volume of data subjects and records</b> - this can be approximate if it is difficult to be precise at the time of the DPIA	Difficult to be precise, recordings running for 30 days on a rolling programme
<b>Retention periods for personal data</b> - how long will the personal data be retained for the processing purposes? Will there be differing retention periods for different categories of personal data or data subject?	The data is recorded digitally onto a DVD recorder. Data is collected over a period of 30 days before being automatically overwritten.
<b>Context of the processing</b>	
<b>Relationship with the data subjects</b> - describe the nature of the school's relationship with the data subjects	Parents, children, staff and visitors to the school are made aware of CCTV being operational through large signs around the school site.
<b>Data subjects' expectations</b> - how much control will they have? Would they consider this to be a reasonable use of their personal data?	If there is a subject access request that includes CCTV images, the rights and freedoms of any third parties will need to be considered. If it is not possible to pixilate images, stills may be provided in order to block out images. The person requesting the access may also be asked to view the footage on school premises as an alternative to passing the data on. (Please see CCTV policy)
<b>Relevant matters of public concern</b> - are there any issues of public concern relating to the scope of the processing that should be taken into account?	The camera positions have been considered so that they are non-invasive in relation to neighbouring residential housing and comply with the principle of reasonable expectation of privacy.
<b>Purposes of processing</b>	
<b>Benefits to the data subject</b> - describe how the processing benefits the data subjects/individuals directly or indirectly	The school would like to achieve added security for the premises and the people that use the building.
<b>Benefits to the school/trust</b> - describe how the processing benefits the school/trust either directly or indirectly	The benefits are that CCTV is a deterrent to potential unlawful activity such as break-ins or vandalism.

<p><b>Benefits to third parties</b> - describe how the processing benefits any third parties either directly or indirectly</p>	<p>It is not anticipated that there will be any effect on other individuals as the only person having access to the recordings will be the headteacher. The monitor for the DVD recorder is stored in a separate locked cupboard in the school and will only be connected following an incident.</p>
<p><b>Step 3: Consultation process</b></p>	
<p><b>Input of school/trust professionals /stakeholders</b> e.g., advice from staff, subject experts, Trust DPO, HR Team etc as appropriate</p>	<p>This is for the security of the premises and therefore a legitimate interest. Parents are aware this is in place through signage installed around the school and parents have also been raising money for the CCTV to be installed following the number of break-ins the school has suffered.</p>
<p><b>Input from data subjects or their representatives</b> - describe views sought, methods used as relevant; or justification for not seeking input</p>	<p>As the parent community was already supportive of installing CCTV, a formal consultation was not considered necessary.</p>
<p><b>Input of any relevant third parties</b> e.g., wider school/trust community, third party processors, processors, facility hirers, lawyers etc as appropriate; or justification for not seeking input</p>	<p>No third parties consulted</p>
<p><b>Step 4: Assessment of necessity and proportionality</b></p>	
<p><b>Purpose and necessity</b> - describe how the processing will achieve the purpose of the initiative/project. Why is it necessary?</p>	<p>We believe that CCTV is the best way to improve security of our school site following 4 break-ins in the past year.</p>
<p><b>Lawful basis for processing</b> - identify the most appropriate lawful basis for processing. Identify a lawful condition for the processing of any special category data of criminal convictions data as appropriate (see Guidance on Lawful Basis for more advice and guidance in choosing a lawful basis).</p>	<p>We will be processing this data under the lawful basis of legitimate interests and believe, as stated above, the recordings will be only viewed following an incident, or if there is a subject access request that includes a request for images. The recordings will be kept for 30 days before being automatically overwritten.</p>
<p><b>Fairness and transparency</b> - describe how data subjects will be informed about the processing of their personal data, e.g., through privacy notices, newsletters, consent forms etc.</p>	<p>We will ensure that our privacy notice is updated to reflect that we are using CCTV so that data subjects are aware and know what their rights are.</p>

<b>Data quality and minimisation</b> - describe how the data will be kept accurate and up to date. Describe the steps that will be taken to ensure only the minimum amount of personal data that is necessary is collected and used. How will you prevent the data being used for purposes beyond the scope of the initiative/project?	Parents, children, staff and visitors to the school are made aware of CCTV being operational through large signs around the school site. Images will only be accessed by the Headteacher after criminal activity or there is a subject access request concerning the individual's image.
<b>Storage limitation</b> - describe how the personal data will not be retained longer than necessary for the purposes of the processing.	Automatically overwritten after 30 days
<b>Security, integrity and confidentiality</b> - describe the measures that will be in place to keep the personal data secure, including protection against personal data breaches e.g., physical, technical and organisational measures.	Data digitally captured and the recording device is kept in a locked cupboard which is only accessible by the Headteacher
<b>Data subject rights</b> - describe how data subjects will be able to exercise their rights: to be informed, access their personal information, rectification, erasure, objection. This is about clear information in your privacy notices and how you make them available to data subjects and how you remind them, as appropriate.	We will ensure that our privacy notice is updated to reflect that we are using CCTV so that data subjects are aware and know what their rights are.
<b>Third party processors</b> - where relevant, describe how you will check that any third-party processors will keep the personal data secure and how they are compliant with data protection law.	Not relevant
<b>International transfers of personal data</b> - How will you ensure the international transfer rules are met in relation to any transfers of personal data beyond the UK? N.B. There is an adequacy agreement in place between the UK and EEA countries which means that these requirements are met. For any other countries, seek the advice of the DPO.	Not relevant

**Step 5: Identification and assessment of risk (see risk assessment matrix and examples of risk)**

Ref No.	Source of risk and potential impact on data subjects or associated school/trust risks	Likelihood of harm	Impact/severity of harm	Overall risk Low, medium, high
1	Data may be viewed by persons other than the headteacher or site manager	Remote	Minimal	Low
2	Data may be stored/shared by persons other than the headteacher or site manager for reasons other than security	Remote	Significant	Low
3				
4				

<b>Step 6: Identification of controls and measures to reduce risk</b>				
Ref No.	Controls or measures to reduce or eliminate risk	Effect on risk - extent to which risk is eliminated, reduced, accepted	Residual risk - low, medium, high	Measure approved Yes/No
1	Data may be viewed by persons other than the headteacher or site manager  Only one person has access to the cupboard where the DVD is stored.  Monitor stored in alternative locked location.  Option to have CCTV images	Reduced	Low	Yes

	<p>directed to mobile app has been declined.</p> <p>Recordings only reviewed following a break in or when there is a request for images in a subject access request</p>			
2 Data may be stored/shared by persons other than the headteacher or site manager for reasons other than security	<p>Only one person has access to the cupboard where the DVD is stored.</p> <p>Monitor stored in alternative locked location.</p> <p>Option to have CCTV images directed to mobile app has been declined.</p> <p>Recordings only reviewed following a break in</p>	Reduced	Low	Yes
3				
4				

	Name/position/date	Notes
Measures approved by	Headteacher and LGB	Integrate any actions back into project plan with



		timeline and responsibility for completion
Residual risks approved by	Headteacher and LGB	If accepting any residual high risk contact the DPO who will consult with the ICO
DPO advice provided	Advice provided and compliance matters identified	DPO should advise on compliance, Step 6 measures and whether processing can proceed.
Summary of DPO advice		
DPO advice accepted or overruled by:	Accepted	If overruled, you must explain your reasons
Any comments		
Consultation responses reviewed by:		If your decision departs from consultation views, you must explain your reasons
Comments		
This DPIA will be kept under review by:	Headteacher and LGB annually	Record frequency of review