



THE CORBET SCHOOL

Data Protection Impact Assessment Policy & Procedure

Data Protection Impact Assessment (DPIA) for new Projects or Systems

General Details

Project Title	CCTV
Project Lead	
Contact Details	
DPO	Keith Rendell
Contact Details	Rendell.k@corbet.shropshire.sch.uk 01939 262001
Date DPIA Completed	23 rd May 2018

General Project Description

Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties:

Site Security - Theft, Damage, Trespass, Unsocial Behaviour

Behaviour Management - Monitoring of interactions on the school site, to support incident investigations and identification of individuals.

Will the project/system involve the processing of personal data or special category (sensitive) personal data?

YES

If 'No', please sign and forward the DPIA to the IT Security Manager, Head of Programme Office and Director of IT for their awareness and stored by the DPO for accountability purposes.

If 'Yes', please complete the sections below:

1. Systematic Description of the Envisaged Processing Operations

1.1 Create a Data Flow Diagram and attach it as Annex 1 to this DPIA.

1.2 Identify the data subjects:

Any unauthorised access to the premises.
Contractors
Parents / Guardians
Visitors
Pupils

1.3 What personal data will be processed?

CCTV video footage only.

1.4 What special category (sensitive) data or criminal convictions data will be processed?

None

1.5 What are the purposes and lawful grounds for processing the personal data identified above?

	Personal Data	Purpose	Lawful basis
1	Image	Identity	Health & Safety & Security
2			
3			
4			
5			

1.6 Describe the nature, scope and context of the processing, including a functional description of the processing operations:

Activity is recorded onto temporary storage and deleted when the storage disk is full (up to 2 weeks).

In the event that an incident is recorded and the footage is part of an investigation the record will be 'bookmarked' or copied to disk and held as part of the pupil file record.

1.7 Describe the assets on which the personal data relies (hardware, software, people, paper, networks, transmission channels)

The cctv is an Avigilon system and has data storage software capability.

1.8 Set out the periods for retention of the personal data:

The system will retain 'bookmarked' footage. Disk copies will be retained in the pupil file and disposed of securely in accordance with pupil record retention periods. (Age 25 & 35 for SEN)

1.9 Set out details of any data sharing with third parties, including sub-processors:

Footage will be shared with Police in the event that there is a police investigation.

1.10 Set out details of any data sharing outside the EEA or with any international organisations:

None

2. Necessity and Proportionality Assessment

2.1 If legitimate interest is identified as the lawful basis, set out details below:

- a) Identify the legitimate interest
Health & Safety of people & pupils at school and security of assets
- b) Explain why processing is necessary for the identified legitimate interest
Identification of non- conformity to enable investigation and ultimately changes in behaviour.
- c) Balance the legitimate interest against the rights and freedoms of the data subjects
Only used to identify and correct unauthorised access to site or inappropriate behaviour.

2.2 Identify any personal data processed in a manner which is not necessary for the identified purpose:

Recording will include some authorised access and acceptable behaviour as individuals go about their normal school activity. This will be deleted automatically as the recorded data is continually updated.

Only bookmarked or disk copies will be retained .

3. Assessment of Risks to the Rights and Freedoms of the Data Subjects

Consider and describe the risks to the rights and freedoms of the data subjects in the following areas:

3.1 Lawfulness of processing

3.2 Fairness and transparency of processing

3.3 Data minimisation

3.4 Maintaining accurate and up to date data

3.5 Ability for data subjects to opt out or object to processing

3.6 Ability to respond to subject access requests

3.7 Rights of the data subjects

3.8 Transfers to third parties

3.9 Transfers outside the EEA or to international organisations

3.10 Retention and deletion

3.11 Data security

3.12 Further risks

4. Measures Envisaged to Address the Risks

4.1 Complete the following table using the risks identified above:

	Risk	Controls to be implemented	Proposed Mitigation
1			
2			
3			
4			
5			

5. Compliance with Guidance/Codes of Conduct

5.1 Identify any applicable guidance and/or codes of conduct issued by the Government, the ICO, the Commission or any relevant association or body:

5.2 Where applicable, set out details of compliance with any relevant guidance and/or code of conduct:

6. Involvement of Data Subjects

6.1 Where appropriate, seek the views of the data subjects or their representatives on the intended processing and set out the findings below:

6.2 If the views of the data subjects have not been sought, set out the rationale below, with reference to any commercial or public interests and the security of processing operations:

7. DPIA Review

7.1 Identify any planned changes to the project or system and set a date to review this DPIA:

7.2 This DPIA will be reviewed to assess if processing is performed in accordance with this DPIA on:

Date

8. Approval

This project was assessed and its Data Protection Impact Assessment approved:

DPO Date

Head Teacher Date

Annex 1 – Data Flow Diagram