



Argoed High School

CCTV Data Protection Impact Assessment

Location of surveillance camera system being assessed:

Argoed High School, Bryn Road, Bryn-Y-Baal, CH7 6RY

Date of assessment:

21/06/2019

Review Date:

21/06/2020

Name of person responsible:

P Smith (headteacher) / M Morton (IT Manager)

Name of Data Protection Officer:

David Bridge

1. What are the problems that need to be addresses in defining the purpose for using the surveillance camera system?

Behavioural issues in open places such as corridors, vandalism in high value areas such as computer rooms, setting off of fire alarms without evidence of a fire, damages to school property, ability to view to school site and monitor for visitors who have not been given access to the site, security in high risk areas such as reception.

2. Can surveillance camera technology realistically mitigate the risks attached to those problems?

Surveillance technology will reduce the likelihood of behavioural events taking place but could never completely mitigate them. The cameras will foster a safer and friendlier atmosphere by ensuring issues can be viewed and the perpetrators given consequences to their actions resulting in them being less likely to behave in such a manner. Vandalism incidents will be reduced as the systems will allow for those responsible to be charged for the damage caused resulting in them being less likely to cause damage to school property. Monitoring for unwanted visitors will allow the police to be notified faster of such incidents reducing the likelihood of those visitors causing damage or intruding on the schools functionality.

3. What other less privacy-intrusive solutions have been considered?

Other options have been considered, the school already has adequate lighting and physical building security and improving these would not solve the problems mentioned in section 1. Increased staff levels have been considered but the cost of this along with the practicality of such a system was deemed an unacceptable solution. Discussions with other schools showed CCTV was the most effective and practical solution to the problems mentioned.

4. What is the lawful basis for using the surveillance camera system?

The school has a **Legal Obligation** to protect the pupils, staff and visitors of the school from harm. The CCTV system is used to monitor the safety and security of the site. Article 6(1)(3) **Public Task**.

5. Description of the information flows:

The CCTV system collects video footage from multiple cameras situated inside and outside the building. The system has no facial recognition, audio or ANPR functionality. The live video feeds are sent to a central DVR (Digital Video Recorder) where they are recorded onto the encrypted drives inside the DVR. A large screen in the administration office displays the live feeds for selected cameras for the purpose of security. The video signals are transmitted down CAT5e network cables and switches which are completely independent of the schools own wired network. The DVR is connected to the schools wired network via a single cable for the purpose of accessing the recordings and downloading the files. The data transmitted across the network is encrypted using the systems own encryption algorithms. The cameras are recording 24/7 including through the night using their night vision mode. Everything/everyone that enters the cameras field of view will be recorded to the DVR. The system has been isolated from the schools own wired network to protect against cyber attack as there is no feasible way for an attacker to communicate between these networks as even through the DVR is connected to both its own and the schools wired network, the DVR has 2 separate network cards to isolate the communications. Recording retention times are viewable in the schools CCTV policy. Appendix 1 show the information flows in diagram format.

6. What are the views of those under surveillance?

The cameras use masking technology so no private property or individuals on the property are viewed by this system.

7. What are the benefits gained from using surveillance cameras?

Improved security, improved health and safety due to the ability to continuously monitor the site and person who may be at risk. Improved pupil behaviour

8. What are the privacy risks arising from the surveillance cameras?

Inappropriate viewing of neighbouring property and behaviour within school.

9. Have any data protection by design and default features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements?

Privacy masking filters, camera locations have been considered to minimise intrusion. No cameras have the ability to view toilet areas.
The ability to view live and historical CCTV data available via network software is only to be provided at designated locations and to authorised persons only. Direct access to recorded data is limited to the Senior Leadership Team, Progress Leaders and the IT Manager. Anyone outside of these groups who believes they need to view recordings or live feeds will have to make an official request to the IT Manager via the schools internal recording systems (SchoolEngine). Access will only be granted if the request meets this policy's requirements and only the requested section will be viewable to the requestee while the IT Manager is present, no footage will be exported or downloaded for members outside the groups mentioned above.

10. What organisations will be using the surveillance cameras images and where is the controller responsibility under GDPR and Data Protection Act 2018?

The system is local within the school and there are no feasible ways for anyone outside the school site to view the system. Argoed High School governing body are the data controllers, the headteacher is the SRO (Senior Responsible Officer).

11. Do the images need to be able to recognise or identify individuals?

There is no facial recognition software on the CCTV system but individuals can be identified by appropriate staff when required.

12. How will you inform people that they are under surveillance and respond to any Subject Access Requests, the exercise of any other rights of data subjects, complaints or requests for information?

CCTV signage plus the fair processing information on the school website.

13. How will the school know if the particular camera/system/hardware/software/firmware being used does deliver the desired benefit now and in the future?

The system is regularly reviewed by the IT Manager to ensure that all the cameras and hardware are having the desired benefit.

14. What future demands may arise for wider use of the images and how will it be addressed?

It is not envisaged that wider use will be required. If this is necessary the DPIA and policies will be reviewed.

15. Has the school considered the extent to which the surveillance camera system may interfere with the rights and freedoms conferred under the European Convention on Human Rights?

Yes, privacy concerns are addressed above.

16. Do any of these measures discriminate against any particular sections of the community?

No,

Appendix 1

Information Flow and CCTV Viewing/Downloading Procedure

