

Privacy Impact Assessment – Parrenthorn High School

Use of surveillance CCTV in schools: impact assessments

Any school that employs surveillance CCTV for whatever purposes on its campus must comply with all statutory regulations covering its use, as enshrined in the Data Protection Act 1998, the Human Rights Act 1998 and in certain circumstances, the Regulation of Investigatory Powers Act 2000. There are specific requirements that refer chiefly, but not exhaustively, to the installation of CCTV equipment and its employment, as well to the collection, analysis, dissemination and storage of data collected, that the school must address and be seen to be implementing actively.

A school is required to have a detailed policy covering every aspect of the use of surveillance CCTV and the data collected on its premises, and must have an appointed data controlling officer, preferably from the senior management team, to oversee and control all aspects of the use of surveillance CCTV and data collected from it. Registration for the use of CCTV surveillance must be maintained with the Office of the Information Commissioner, from where a suitable code of practice on its use can also be obtained.

An impact assessment can be a very useful method of detailing important aspects of the use of surveillance CCTV in a school and how it will affect those present, in particular, but not exclusively, staff and students. The impact assessment needs to address the following requirements.

- The exact purpose for the use of surveillance CCTV in each any every area of coverage.
- An assessment of the suitability for the use of CCTV over other methods considered for achieving the same or similar outcome.
- An assessment of the proportionality of the level of coverage employed, with regard to amount of equipment in use and time periods for which it is activated
- The possible/potential ways in which the data collected could be used, affecting directly or indirectly those monitored, including any restrictions on its usage, for each and every area of coverage.
- Where any/all data is stored for later possible use, the suitability of this over other methods to achieve the same information and outcomes.
- For each and every area of coverage, the identification of personnel having immediate access to the data collected through general authorisation as part of their specific duties, including the data controlling officer and other systems' monitors with general or limited authorisation on their behalf to view the data for whatever purpose.
- For each and every area of coverage, where data may be stored, how and by whom the data will be processed in any manner, and for what purpose.
- For each and every area of coverage, the identification of personnel who can gain access to any/all data collected, as an intrinsic part of their duties (only if requisite authorisation has been granted, permanently or temporarily) and where possible, indication of whether any authorised use can be made of the

released data, as well as any restrictions placed upon its use by the third party.

- Detailed methods by which all personnel, whose images could be captured by an active surveillance CCTV system, will be informed of this possibility, including appropriate signs and channels through which further information can be obtained.
- Specifically, in addition to the above, if the CCTV surveillance equipment is entirely operated by an outside agency, which also controls the collection, monitoring and use of all data obtained, a clear statement to this effect with full contact details of the agency.

It is further considered desirable that for every instance where those present could possibly be captured on surveillance CCTV, an assessment will be made concerning the individual's right to privacy, limited or otherwise and the impact on their ability to perform in their most effective and personally comfortable way; this including both staff and students, but not exclusively. Whilst this assessment is bound to have a significant subjective element, it should nevertheless be considered as an important part of the overall statement.

This is an impact assessment statement for the use of surveillance CCTV at:

.....Parrenthorn High School

.....Heywood Road Prestwich Manchester M25 2BW

This assessment has been carried out by:

Andrew Morley..... (name)

Business Manager..... (position)

Date of assessment 29th August 2017....

The data controlling officer for the school is:

.Andrew Morley..... (name)

.Business Manager..... (position)

.0161 772 9139..... (telephone contact)

A.morley@bury.gov.uk..... (email contact)

Registration with the Office of the Information Commissioner last updated on
...02 /10/ 2016

Areas on the school campus covered by installed surveillance CCTV, whether active or not.

Unit	Number	Location	Fixed	Scan
1	1	External – Near Science		y
1	2	External – Front of school: carpark		y
1	3	External – Rear of school : playground		Y
1	4	Same as Unit 1 camera 1		
1	5	Internal – Entry door near dining room	y	
1	6	Internal – Stairs near pupil entrance	y	
1	7	External – Sports Centre entrance		Y
1	8	Internal – Pupil entrance	Y	
1	9	Internal – Outside Drama Theatre/ re-val unit	y	
1	10	External – Entrance		Y
1	11	Internal – Humanities toilet lobby	Y	
1	12	Internal – Humanities corridor/ print room	Y	
1	13	Internal – Sports corridor	Y	
1	14	Internal – Science entrance		Y
1	15	Internal – Technology corridor	Y	
1	16	Internal – ICT/ re-val unit	y	
Unit	Number	Location	Fixed	Scan
2	1	Internal – B corridor – near B8	y	
2	2	External – Field		Y
2	3	Internal – B Corridor – near Assembly Hall	Y	
2	4	Internal – A Corridor – near Bridge	Y	

2	5	External – Front of school – Near Music		Y
2	6	Internal – Stairs to PE	Y	
2	7	Internal – Music Entrance	y	
2	8	Internal – Main reception lobby	Y	
2	9	Internal – B Corridor – near A8	y	
2	10	Internal – Entrance doors– rear of new block	Y	
2	11	Internal – Entrance doors – middle stairs	Y	
2	12	Internal – Board room corridor	Y	
2	13	Internal – Assembly Hall	Y	
2	14	Internal – Sports Lounge	Y	
2	15	Internal – Sports Hall	Y	
2	16	Internal – Link corridor to B Block	y	

Identify the need for a Privacy Impact Assessment

CCTV is used by the school for the following

To maintain a safe environment, helping to ensure the welfare of pupils, staff and visitors.

To protect the school buildings and assets

To increase personal safety and reduce the fear of crime

To support the Police in a bid to deter and detect crime

To assist in identifying, apprehending and prosecuting offenders

To assist in managing the school

Images are recorded, retained and can be reviewed which will result in personal data being collected and hence a PIA

Assesment of amount of equipment used and time equipment is active:

The school operate a network of 32 CCTV cameras and a linked recording device on which video images are stored. All cameras will be located in paces at the school to which staff, students and visitors are all admitted freely. The system is operational 24 hours a day, 7 days a week. The cameras are located at entrances and external areas to provide additional security, external units provide coverage to playing areas of the school site. Internal units cover the biometric units as well as specific areas of high traffic.

Specific ways in which data collected will be used, including restrictions:

Images are recorded and can be viewed live in two locations in school, one the Site Managers room, the second the Business Manager's office. Access to these rooms is restricted to staff. Other staff need to request to view live footage or access stored images. The images are used to detect unauthorised visitors, pupils with poor behaviour/ internal truancy, protection of damage to school assets, assistance to the Police.

For stored data, the method used, the maximum length of time of storage, and how the data might be used:

The system is set up to over write images after 20 days. It is possible to extract a copy of cctv footage and retain for longer periods. This has to be authorised by the Headteacher or Business Manager.

All personnel having immediate access to data collected and stored, as part of specific duties:

Site Manager (or site staff on duty), Business Manager- both can view live footage and retrieve archived footage upto automatic deletion limit, Sports Centre Duty Manager – Live footage.

External viewing access is not permitted

Details of how data may be processed, by whom and what purpose(s):

Images may be viewed by authorised staff (Site staff, Business Manager, Pastoral Support Staff, SLT, Duty Officer). This is to help maintain site security, access control, pupil and staff safety.

Details of further personnel who may gain temporary access to data as part of their duties:

Pastoral staff , SLT , Heads of Year – for pupil behaviour/ management issues.

Methods of notification of the presence of surveillance CCTV and other information channels:

Warning signs located around school, cameras all visible

Details of all method(s) by which images, or collected data, from CCTV may be streamed to any outside agency or other parties, if relevant. Restrictions on access are also included:

No external access approved.

Where an outside agency is entirely responsible for the operation and control of the CCTV equipment, its monitoring and the collection and use of data collected, all relevant and necessary details:

CCTV is not monitored externally.

Assessment of any possible impact of CCTV surveillance on the right to privacy, performance or general well-being of any individuals:

Cameras are located in areas where pupils, staff and pupil have access. Cameras are not located in areas where privacy is expected such as Toilets or changing rooms.
Access to images is restricted to authorised staff.

Other relevant information:

The CCTV system is registered with the Information Commissioner/ Data Protection Registration.
See Policy for Use of CCTV in school