

# CCTV system

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## Submitting controller details

Name of controller	St Mark's Catholic School
Title of DPO and Name of DPO	External DPO – Richard Maskrey Internal DPO - Emma Gritten – CFO

## Step 1: Identify the need for a DPIA

Explain broadly what project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as a project proposal. Summarise why you identified the need for a DPIA.

The CCTV system consistently delivers benefits in terms of improved health and safety and security within schools. It complements other security measures which are in place within the school.

CCTV aims to achieve the following:

- Improve the health and safety and security of pupils, staff, and visitors
- Protect the school buildings and internal infrastructure
- Reduce vandalism
- Provide assistance in the detection and prevention of crime

A CCTV Policy is in place and refers to this DPIA.

## Step 2: Describe the processing

**Describe the nature of the processing:** how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or other way of describing data flows. What types of processing identified as likely high risk are involved?

### **How will you collect, use, store and delete data?**

The CCTV system provides the school with video pictures from 92 fixed based cameras located throughout the school and the images will be transmitted/captured on a Network Video Recorder (NVR)

The CCTV system is operational 24 hours a day, 7 days a week. The images are stored on NVRs located in locked cabinets in rooms around the school site with a secure door entry system. Access is restricted to the Estates Manager, ICT Systems Manager, Pastoral and Attendance Manager, Deputy Headteachers and Headteacher.

The transmitted images can be viewed via the Site team office, IT office and Pastoral and Attendance Managers office

### **What is the source of the data?**

The CCTV system provides video pictures, which are transmitted from cameras positioned in various locations throughout the school. All of the CCTV cameras are fixed on a particular scene.

The location of the CCTV cameras are as follows:

### **Appendix 2 - location on CCTV**

Science 1st floor	Sports Block - Basketball Hoops
Visitors car park 1	Senior Playground - O/S ICT
Back stairs second floor	
Art Rooms walkway jnr playground	Music Block
Visitors car park 2	6th Form - Room 64 Back
Reception Car Park	6th Form
Back Stairs first floor (R104)	6th form SR RM44
Back Stairs (playground doors)	N Block facing music fire exit
N block facing exams office	Car Park Mini Bus Snr Playground
6th Form - Room 64 Front	6th form reception
1-35- St Cecilia G/F 5	Science ground
Prayer Garden	OS Maggies
Student Services	Blue stairs second floor
Blue Stairs first floor (R110)	Sports Block - Front Entrance ou
LRC Computer room	Sports Block - back of hall o/s
Staff Dining	Sports Hall Corridor
Parish Hall End	Sports Block - main hall fire ex
Music Block Ground Lobby	Sports Block - back facing cage4
Science ground	Sports Hall reception
Maggies corridor & Theatre	Main Hall
Senior Playground Wide N Block	Jnr playground benches o/s back
Green stairs second floor	Green Stairs OS RM101
Staff Room	3-6e Benches OS Staff RM-1
Drama Room (36) Corridor	Science 1st floor

Maggies facing counter	3P-5E-Play Ground OS LRC-1
Church Gate O/S 6th Form	sport block facing hoops
Green stairs 3rd floor (302)	Playground Corner
Music Block outside panning	Theatre facing n block
Maggie's whole room	Outside Rm9
6th form bench area	First Floor 105 corr
Science entrance	First floor 106 corr
Maggies facing doors	Main flor 205 corr
Music Block corridor	2nd floor 207 corr
Canteen	St Michael's Hall
Blue stairs 3rd floor (306)	Playground Cages
O/S R24	St Michael and Martin Hall
2-9E Bike Shed-1	Sixth form ipad
Reception	N block 1st floor
Back stairs 3rd floor (304)	History doors
O/S staffroom	Technology
Technology Foyer	Jnr Playground Static
Reception Car Park panning	Reception Facing Finance
Small playground facing art	Camera facing Finance
Small playground basketball hoop	Small playground facing art
Senior Playground Wide N Block	Small playground basketball hoop
Sports Block - Basketball Hoops	

**Will you be sharing data with anyone?**

The information is used to ensure the health and safety and security of pupils, staff and visitors. The data can be used to detect unauthorised visitors, pupils with poor behaviour/internal truancy, and protection of damage to school assets. The information may be shared with the Senior Leadership Team and the Police for investigation and enforcement purposes. Disclosure of data is covered by the school's internal processes which are fully compliant with relevant legislation and Codes of Practice (please see the school's CCTV Policy).

**What types of processing identified as likely high risk are involved**

The following processing is identified high risk:

- Recording of images
- Storage of images securely
- Appropriate data retention applied to the images.

The digital video recorder is located in the IT Office. Access to the images is password protected. Data Management controls include passwords to the CCTV system. (see comment above) Individuals can request copies of CCTV data which contains their personal information by submitting a subject access request

**Describe the scope of the processing:** what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

**What is the nature of the data?**

The CCTV data captured are video recordings.

**Is Special Category data held?**

By default the CCTV may identify special category data including race/ethnic origin.

**How much data is collected and used and how often?**

The CCTV is operational 24 hours, seven days a week.

**How long will data be retained for?**

Images will be retained for 30 days unless requested as part of an incident and then stored on archive for the period of the investigation process or for 12 months whichever is the lesser. Any data which is retained for an investigation will be saved in a secure google drive and will only be shared with those who need access to it during the course of the investigation. Access by specific individuals should be removed once no longer required.

**Scope of data obtained?**

The CCTV images are obtained within the confines of the school.

**Describe the context of the processing:** what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this

way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

**What is the nature of your relationship with the individuals?**

The school provides education to its pupils on a term time basis with staff delivering the National Curriculum.

The school may receive a number of visitors on a daily basis all year round including contractors, inspectors, support and agency staff, members of the public (for example who use the premises for lettings).

**How much control will they have?**

The school informs pupils, staff and visitors that CCTV is in use through signage on site. The CCTV signage is located on entry to the school site. The CCTV system is capable of identifying individuals from the system and the images can be used in both criminal and civil court cases. If a Subject Access Request is made data may be downloaded or copied for release to the data subject.

**Do they include children or other vulnerable groups?**

Cameras are located in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected. There are no cameras in changing rooms and there are no cameras aimed at private areas such as residents' houses.

**Are there prior concerns over this type of processing or security flaws?**

The school has a CCTV Policy. The system is operated in line with relevant legislation and the Surveillance Camera Code of Practice. Staff operating/using the system have undertaken Data Protection training and read the Surveillance Camera Code of Practice.

**Describe the purposes of the processing:** what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing – for you, and more broadly?

The CCTV system is proportionate and justified. It also achieves for the school the following benefits:

1. demonstrates a duty of care to its pupils, staff, and visitors
2. protects the fabric of the school both externally and internally
3. provides assistance in the detection and prevention of crime
4. assists in managing the school

The CCTV system should be referenced in the school's Privacy Notice (Parent and Pupil) (Staff and Volunteers).

## Step 3: Consultation process

**Consider how to consult with relevant stakeholders:** describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

The CCTV system was initially installed in 2019 and has been expanded since then. During this time a number of the cameras have also been replaced and/or upgraded. Consultation is not required due to the safeguarding importance of the system. The use of CCTV is proportionate to the need and requirements identified.

## Step 4: Assess necessity and proportionality

**Describe compliance and proportionality measures, in particular:** what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

**What is the lawful basis for processing?**

Public Task (safe and effective running of the school including prevention and investigation of crime)

Legal Obligation (Health & Safety)

Legitimate Interests (prevention of loss/damage; and prevention/investigation of crime outside normal school hours)

**Does the processing achieve your purpose?**

Cameras are located in areas where pupils and staff have access. Cameras are not located in areas where privacy is expected.

**Is there another way to achieve the same outcome?**

The school has not identified another way to achieve the same outcome. Similar CCTV systems are in operation in the majority of schools across the UK.

**How will you prevent function creep?**

The lawful basis for processing will be contained in the school's CCTV Policy.

Where there has been a material change to the way CCTV is used, the school will undertake a review of its CCTV system to ensure compliance and mitigate against

'function creep.' After any changes are implemented, the school's CCTV Policy will be reviewed and amended in conjunction with approval by the Local Governing Committee.

**How will you ensure data quality and data minimisation?**

The school will continue to be compliant with its CCTV Policy and will keep this policy under regular review.

**What information will you give the individuals?**

The school informs pupils, staff and visitors that CCTV is in use by installing signs along with a contact telephone number

**How will you help them support their rights?**

The school has a Subject Access Request procedure in place to ensure compliance with Data Protection Law. CCTV signage states a contact telephone number. The school will continue to be compliant with its Data Protection Policy.

**Step 5: Identify and assess risks**

<b>Describe source of risk and nature of potential impact on individuals.</b> Include associated compliance and corporate risks as necessary.	<b>Likelihood of harm</b>	<b>Severity of harm</b>	<b>Overall risk</b>
Appropriate CCTV signage in place which conforms to industry standards	Remote	Minimal	Low
CCTV policies and procedures not in place leading to inconsistencies of practice	Remote	Minimal	Low
CCTV inappropriately accessed	Possible	Minimal	Low
CCTV data not deleted in line with retention schedule	Possible	Significant	Medium

**Step 6: Identify measures to reduce risk**

<b>Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in step 5</b>				
<b>Risk</b>	<b>Options to reduce or eliminate risk</b>	<b>Effect on risk</b>	<b>Residual risk</b>	<b>Measure approved</b>

CCTV policies and procedures not in place leading to inconsistencies of practice	CCTV policy in place and communicated to staff	Reduce risk	Low	Yes
CCTV inappropriately accessed	CCTV policy in place and communicated to staff.	Reduce risk	Low	Yes
CCTV data not deleted in line with retention schedules	30 day automatic deletion for data. Data retained for an investigation to be reviewed periodically and deleted 12 months after the end of the investigation.	Reduce risk	Low	Yes

## Step 7: Sign off and record outcomes

Item	Name/position/date	Notes
Measures approved by:	Emma Gritten CFO 27 May 2025	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Emma Gritten CFO 27 May 2025	Consultation with ICO not required as no residual high risk
DPO advice provided:	Richard Maskrey	DPO should advise on compliance, step 6 measures

	Data Protection Officer 30 May 2025	and whether processing can proceed
DPO advice accepted or overruled by:		If overruled, you must explain your reasons
Comments:		
Consultation responses reviewed by:	N/A	If your decision departs from individuals' views, you must explain your reasons
Comments: No formal consultation undertaken		
This DPIA will kept under review by:	Emma Gritten CFO	The DPO should also review ongoing compliance with DPIA