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CCTV PRIVACY IMPACT ASSESSMENT – ST MARY’S CE PRIMARY SCHOOL

Name of member of staff responsible for the system:

Mrs Helen Collinge

Position School Bursar

Name of person carrying out the assessment

Mr Neil Gurman

Position: Headteacher

Assessment Date:December 2022

Review Date (at least every 2 years)

December 2024

Description of the CCTV system

- Data recorder and viewing screen based in the school office.
(NB.Only the School Bursar, Site Supervisor and Headteacher have access rights to equipment the CCTV equipment.)
- Images from the camera equipment can be viewed ‘live’ at all times (by authorised Controllers named above) These recorded images are stored on the data recorder for no longer than **7 days** before being automatically permanently deleted.
- The school chooses to use cameras that are in fixed positions all of the time.
- The system is in operation 24 hours per day.
- There are 15 external cameras on site. Cameras are located at the following positions
 - 2 cameras located at the main reception entrance of school.
 - 1 camera located at the main entrance hall
 - 1 camera located at the main entrance hall surveying the school car park
 - 1 camera by the entrance to the community room
 - 2 cameras located on the wall by the fire exit of the community room
 - 4 cameras located above the staff room for the KS1 and KS2 playgrounds
 - 1 camera located at the entrance to the KS2 classrooms
 - 2 cameras located viewing the KS2 playground close to the KS2 football pitch
 - 1 camera at the entrance to the school kitchen entrance

Purposes of the CCTV system

• St Mary's Primary School, Rawtenstall uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to school property.

Other possible solutions

- Other additional measures have been introduced over the years to improve security and safety, new external perimeter fencing, electronic door locks, security alarms etc.
- Such measures have not, in the schools opinion, removed the need for CCTV as an additional precaution to address the schools concerns and needs.
- Security and safety of the schools community, buildings and facilities is paramount and is always under review.

Advantages of the CCTV system

- The main advantage is the retrospective investigation of issues and incidents. This enables the school to maintain sound management of the schools buildings and facilities and further assist any local authorities, Police, HSE etc. with any associated investigations following any issues or incidents.

Images to be captured

- Any user or visitor to the main school site could be captured on the CCTV system, this could include; pupils, parents, staff, visitors, contractors etc.
- The system does cover all of the main school site and its grounds as well as part of Unity Way and the pedestrian footpath between the school and our Forest School grounds. There is a possibility of capturing images of members of the public who do not enter the school grounds.

Personnel

Personnel with access to the system

- Mr Neil Gurman, Head Teacher, DPO and Premise Manager
- Mrs Helen Collinge School bursar, 'CCTV System Manager' and Data Controller.
- Mr Cliff Smith – Site Supervisor, Site Security, Health and Safety

When and how the images will be accessed

- Images will only be accessed if there is a need to retrospectively investigate an incident or, on occasion, 'live' to witness any such incident as it takes place where there may be a danger to personal investigation or other such appropriate reason.
- Images will only be accessed by those authorised to do so.
- Any useful images may / will be used to assist internal or local authority investigations.
- Any images which are stored as 'recorded' for future reference, will be stored securely and deleted at the appropriate time when they are no longer required.

Ways in which people are made aware of the CCTV system

- Signage is located at the main school entrance and in other locations around the site adjacent to camera equipment.
- Signage includes the reason for use of CCTV and the contact details of the school.
- The school has a full CCTV usage policy which is available on the schools website.
- Staff are aware that CCTV is in operation at all times.

External agencies with access to the system

- There is no access to the school's CCTV system by external agencies or third parties without prior consent from the system manager / Head Teacher of the school.
- If faults develop with the system, appropriate contractor support is sought and the system is repaired appropriately. Such contractors should have no access to images or recorded data as part of any remedial work undertaken.

Security of the system

- The hardware recorder and viewing monitor are stored securely in a locked store cupboard in the school office.
- Only the school bursar, Headteacher and site supervisor are authorised to view the images at this viewing monitor.

Retention of data

- The camera / recorder system used only automatically records images to the hard drive when movement is detected. This is the case 24 hours per day.
- Where specific recorded data is stored additionally so as to support any investigations, it will only be retained for the period of any investigation. It will be manually deleted by the Business Manager at this stage.

Impact on privacy

- Cameras are positioned so that they only cover areas of the school buildings and grounds. They do some public areas: part of the path between school and the Forest Area, as well as part of Unity Way outside the schools main entrance
- Only people visiting the school will have images temporarily recorded (unless such images are used for further investigations in relation to incidents).
- Images are not recorded in order to conduct 'covert monitoring' of staff or visitors unless in exceptional circumstances and with prior authorisation from the Head Teacher.

Other relevant information

- Comprehensive information can be found in addition to this document in the school's CCTV Usage policy. (Dated December 2022)
- Further advice can be found at the locations stated at the end of the school's CCTV Policy.

Conclusions

- The school is satisfied that the current CCTV system in place at the school is necessary and sufficient so as to support the schools desire to prevent or detect crime and to monitor the school buildings and grounds in order to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to school property.
- The school satisfies all external advice (e.g. ICO CCTV Code of Practice) on the operation and usage of CCTV systems and has a compliant CCTV usage Policy in place.
- No further actions are deemed necessary at this review.

Member of staff responsible for the assessment

Name: Neil Gurman - Headteacher

Signed: *N Gurman*

Dated: December 2022

Further actions required

- N/A