



Baines School

Nil Sine Labore

The Governors of Baines School

CCTV Privacy Impact Assessment and Policy for Baines School

Date Adopted: 18th June 2024

Date approved: 18th June 2024

Date of review: 17th January 2024

Due for review: January 2026

Use of surveillance CCTV in schools: impact assessments

Any school that employs surveillance CCTV for whatever purposes on its site 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, 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.

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.

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

Baines School (school name)

Highcross Road, Poulton le Fylde, FY6 8BE (school address)

This assessment has been carried out by:

P Fellows, School Business Manager and Craig Stanley, School Network Manager

The assessment is effective from 17/01/2024 until review on 17/01/2024

The data controlling officer for the school is:

The Headteacher, Baines School, Highcross Road, Poulton le Fylde, FY6 8BE

B. Description of the CCTV System

Retrospective assessment based on historic installation.

- Data recorder is split across three servers, held in the server room in T14. Network Manager has full access to CCTV system via computer. IT Technician has a partial view of this system on their own computer.
- Access to server room is restricted to Network Manager and Estates. Network Managers and IT Technicians computer is in N10 and be accessed by authorised staff only.
- Images from the camera equipment can be viewed 'live' at all times (by authorised controllers) and are 'recorded' 24 hours per day. These recorded images are stored on the data recorder for no longer than 95 days before being automatically permanently deleted by overwriting with new recordings.
- The System is in operation 24 hours a day.
- There are 56 cameras on site. Cameras are located at the following positions

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

CAMERA AREA	No.	CAMERA AREA	No.
A Block Art Computer room	1	External Isolation rear 2	29
A Block Art Entrance	2	External M Block	30
B Block B1 Corridor	3	External Main Playground	31
B Block B1 Room	4	External Rear Car Park	32
B Block Ground Floor Toilets	5	External Rear Playground View 1	33
B Block, Ground Floor Reception	6	External Rear Playground View 2	34
B Block Hall	7	External Rear Playground View 3	35
B Block Kitchen Tills	8	External T Block towards S block	36
B Block Kitchen view 1	9	External T/N/B/ Crossover	37
B Block Kitchen view 2	10	L Block ILC Computers	38
B Block Rear door	11	L Block ILC Entrance	39
B Block Reception Internal	12	M Block – Isolation	40
B Block Refectory	13	M Block Ground Floor Toilets	41
B Block Refectory Corridor	14	N Block 1 st Floor middle	42
B Block Science Towards B11	15	N Block First Floor Rear	43
B Block Science Towards B13	16	N Block First Floor toilets	44
B Block Science Towards B18	17	N Block Ground Floor Middle	45
B-Block, Ground Floor First Aid/Science stairs	18	N Block Ground Floor N10 door	46
B-Block, Ground Floor Inclusive toilets	19	N Block Ground Floor Rear	47
B-Block, Ground Floor Pastoral	20	Rear Playground Year 7 decking	48
Drama Studio External entrance/tills	21	S Block Ground Floor Sports Hall Entrance	49
Drama Studio sitting area	22	S Block S11 room	50
External – Reprographics	23	S Block S13 room	51
External Art facing L Block	24	T Block 1 st Floor middle	52
External B Block Car Park Entrance	25	T Block Ground Floor Toilets	53
External B Block Front car park	26	T Block T1 room	54
External Bike Sheds	27	T Block T14 Room	55
External Isolation rear 1	28	T Block T2 room	56

C. Impact assessment for use of CCTV at Baines School

Purpose(s) for use of surveillance CCTV:

Baines School uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitor school activity, the school buildings and grounds, to provide a safe and secure environment for its pupils, staff and visitors, and to prevent loss or damage to school property.

Commented [CS1]: Correct

Advantages of use of CCTV over other possible methods:

The main advantage is as a precautionary measure and 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 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 not cover any area outside of the main school site and its grounds. There is no possibility of capturing images of members of the public who do not enter the school grounds.

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

- 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.

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

The camera / recorder system used automatically records images. This is the case 24 hours per day. Data is automatically, permanently deleted from the hard drive after approximately 90 days.

Where specific recorded data is stored additionally to support any investigations, it will only be retained for the period of any investigation. It will be manually deleted by the Network Manager at this stage. Such recorded images will be password protected and only accessible to the Head teacher, SLT, Business Manager and/or Network Manager.

All personnel having immediate access to data collected and stored, as part of specific duties:(Included are any servicing company's personnel with general access)

1. Mrs Clare Doherty, Headteacher
2. Mr Antony Mycock, Assistant Headteacher
3. Mr Geoff Mates, Assistant Headteacher
4. Mr Mark McGrath, Assistant Headteacher
5. Mr Craig Stanley, Network Manager
6. Miss Philippa Fellows, Business Manager
3. Mr Alex Barlow, ICT Technician

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

1. Used to detect and monitor unlawful activities in real time
2. Used to track and monitor suspicious activities
3. Used to support post incident investigations by authorised school staff and outside agencies

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

There is no access to the school's CCTV system without prior consent from a member of staff with immediate access above.

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

- Staff and pupils are aware that CCTV is in operation at all times.

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:

1. Images initially viewed only on site
2. Video recording of images taken where necessary and stored securely on site
3. Copies of footage/video recordings released to only authorised persons
4. Copies of recordings deleted as appropriate and when no longer required

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:

N/A

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

Cameras are positioned so that they cover internal areas of the school buildings and grounds.

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.

Security of System:

The hardware recorder and viewing monitor are stored securely in the school server room.

Access to the software to view the images (live and/or recorded) on a PC is limited to the Network Manager and the IT Technician.

Recorded images, whilst temporarily stored for the purpose of investigation, are done so with further password protection. All Videos are stored on a shared area, with explicit access only given to those who are authorised to view them.

Previous Assessment/Other relevant information:

1. Previous privacy impact assessments have not been undertaken.
2. The school does not currently have a formal CCTV Usage Policy.
3. Members of staff responsible for this assessment are the School's Network and Business Managers.
4. Comprehensive information can be found in addition to this document in the Information Commissioners Office Data Protection Code of Practice for Surveillance Cameras and Personal Information.

Conclusion:

- 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 2017) on the operation and usage of CCTV systems.
- The school will ensure a CCTV usage policy is implemented in the coming year.
- In line with CCTV Code of Practice signage will be arranged for the main school entrance and in other locations around the site adjacent to camera equipment. Signage will include the reason for use of CCTV and the contact details of the school.
- The school follows guidance detailed in the ICO's Data Protection Code of Practice for Surveillance Cameras and Personal Information which will be made available on the school's website.
- No further actions are deemed necessary at this review.