

# **FAIRFIELD NURSERY SCHOOL**



## **CCTV PRIVACY IMPACT ASSESSMENT**

Dated: October 2024

Review Date: October 2025

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; GPDR and the new Data Protection Act (DPA) 2018; 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 as to the collection, analysis, dissemination and storage of data collected, that the school must address and be seen to be actively implementing.

A school is required to have a detailed policy covering every aspect of the use of the 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 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 and every area of coverage
- An assessment of the suitability of 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 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 or 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.

### **CCTV Privacy Impact Assessment for Fairfield Nursery School**

<b>Name of person responsible for the System</b>	Sacha Walker-Byrne
<b>Position</b>	Head Teacher
<b>Name of person carrying out the Assessment</b>	Gill Rostron
<b>Position</b>	Bursar/Data Protection Officer
<b>Assessment Date</b>	October 2024
<b>Review Date</b>	October 2025

<p><b>Description of the CCTV System</b></p> <p><i>Include here roughly where the cameras and capturing devices are located on the school site, how they will work, where the main system is stored, what times the system is active etc.</i></p> <p>This is an impact assessment statement for the use of surveillance CCTV at: Fairfield Nursery School Fairfield Street, Accrington, Lancs, BB5 0LD</p> <p>There are 10 cameras on site.</p> <p>The areas on the School Site covered by installed surveillance CCTV cameras are:-</p> <ol style="list-style-type: none"> <li>1. Entrance/Reception</li> <li>2. Rear of building</li> <li>3. Classroom Areas – Blossom Room, Spring Room and Willow Room</li> </ol> <p>Data recorder and viewing screen is based in the Head Teachers Office – Access to this rooms is restricted and limited to the Head Teacher, Teachers, Bursar, Site Supervisor and ICT Technical Support Contractor</p> <p>Images from the camera equipment are recorded and can be viewed “live” at all times in the Head Teachers Office. The recorded images are stored on the data recorded for 21 days before being automatically permanently deleted/overwritten</p> <p>The School choses to use the cameras in fixed positions (listed above)</p> <p>The system is in operation 24 hours per day, 7 days per week</p>
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### **Purposes of the CCTV**

*Include here why a CCTV system is needed at the school, and what it seeks to achieve*

Fairfield Nursery School uses CCTV and the images produced for the following:-

- To improve safety and security, prevent or detect crime and to monitor the school buildings and grounds
- To provide/maintain a safe and secure environment for children, staff and visitors
- To increase personal safety and reduce the fear of crime
- To protect school buildings and assets and to prevent loss or damage to school property
- 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 is required

### **Other possible solutions**

*Include here what other options are available for achieving the same purposes – e.g. would better fencing make the site more secure*

Other additional measures have been introduced over the years to improve safety and security, including reinforced perimeter fencing, security alarms, and electronic door doors on specific doors.

Such measures help but have not, in the schools opinion, removed the need for CCTV as an additional precaution to address the schools concerns and needs

Safety and security of the school community (children/parents/staff), buildings and facilities is paramount and is always under review.

### **Advantages of the CCTV System**

*Include here what the advantages of the CCTV system are over the other solutions listed above*

The main advantage is the retrospective investigation of issues and incidents. This enables the school to maintain effective management of the school's 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**

*Explain here who will be included in the images e.g. parents, children, members of staff, visitors and other members of the public, etc.*

Any user or visitor to the main school site could be captured on the CCTV system, this could include – children, parents, staff, visitors, contractors, other members of the public 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.

**Personnel with access to the system**

*List all staff members who will have authority to access the system as part of their job and why*

Sacha Walker-Byrne, Head Teacher – Data Controller and System Manager  
Contracted IT support from ‘the IT Department’ - They maintain the system and have password access to the system

**When and how the images will be accessed**

*Include the circumstance in which the images will be accessed, how those images will be used, how that access will be recorded for audit purposes, etc.*

Images will only be accessed if there is a need to retrospectively investigate an incident or “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**

*Include here details of any signage proposed, what the signs will say; where they are to be located, whether the school has a CCTV Policy, letters to parents that notify etc.*

Signage will be located at the main school entrances (front back and side entrances) x 4

The above signage will include the reason for the use of CCTV and the contact details of the school

Signage will also be displayed at strategic points within the school (near to camera locations)

The School will develop a full CCTV usage Policy which will be made available on the School’s Website

Staff are aware that CCTV is in operation at all times

**External agencies with access to the system**

*Include here details of any third party organisations who will provide and/or maintain the system (or monitor the system), whether they will have access to the system, what restrictions will be placed on them accessing it, etc.*

There is no access to the schools CCTV system by external agencies or third parties without the prior consent from the Head Teacher  
If faults develop with the system, appropriate contractor support is sought and the system is repaired appropriately (by or via The IT Department). Such contractors will have no access to images or recorded data as part of any remedial work undertaken.

**Security of the System**

*Include details of what security measures will be in place to protect the CCTV images – e.g. is the system password protected?*

The hardware recorder and viewing monitor are stored securely in the Head Teachers office. Access is limited to the HT, Teachers, Bursar, Site Manager and ICT Technician. Only the Head Teacher (or a nominated deputy) is authorised to view the images at the viewing monitor  
Access to the software to view the images (live or recorded) on a PC is limited to the Head Teacher. Access to the software is password protected.  
The password is only known to the Head Teacher and the ICT Technician  
Recorded images, whilst temporarily stored for the purpose of an investigation, are done so with further password protection?

**Retention of the data**

*Include here details of how long the CCTV images will be held on the system, how it will be detected (automatically or manually) who will have responsibility for this*

The camera/recorder system used only automatically records images to the hard drive  
This is the case 24 hours per day 7 days per week  
Data is automatically overwritten and permanently deleted from the hard drive after 21 days  
Where specific recorded data is stored additionally to support an investigation, it will only be retained for the period of any investigation. It will be manually deleted by the Head Teacher at this stage. Such recorded images will be password protected and only accessible to the Head Teacher and/or ICT Technician.

**Impact on privacy**

*Include here an assessment of the impact that this system will have on the privacy of individuals, how they will be affected, how the invasion of privacy will be minimised etc.*

Cameras are positioned so that they only cover areas of the school buildings and grounds. They do not cover any “public” or “private” Space  
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

**Previous Assessments**

No previous Privacy Impact Assessment has been undertaken at Fairfield Nursery School

The School is in the process of developing a formal CCTV Usage Policy, which will be published on the Website

**Other relevant information**

Is the CCTV System covered by ICO Registration Number? Please State Number:-ZA363683  
20/5/21

**Conclusions**

*Include here an analysis of the content of this assessment, your conclusion in relation to whether the system should be put in place, whether further actions are required for the system to be put in place, whether there should be further restrictions placed on how the system is used to minimise the impact on privacy, etc.*

The school is satisfied that the current CCTV system in place at the school is necessary and sufficient to support the schools desire to provide a safe and secure environment for children, parents, staff and visitors; will help prevent/detect crime and monitor the school buildings and grounds, helping to prevent loss or damage to school property.  
The school satisfies all external advice  
The school will develop a compliant CCTV Usage Policy and put this in place asap  
The school will obtain and display appropriate signage asap

### Member of Staff responsible for the Assessment

Name: Sacha Walker-Byrne Head Teacher
Signed:
Dated:

<b>Further Actions required:</b>
<i>State what actions are require before the system can be put in place or remain in place</i>
The school will develop a compliant CCTV Usage Policy ad put this in place asap The school will obtain and display appropriate signage asap
When the above actions have been completed the further actions must be signed as completed by the member of staff who carried out this assessment
Signed:-
Dated:-

### Version Control

<b>Named Owner</b>	Gill Rostron – Bursar/Data Protection Officer
<b>Version Number</b>	1.1
<b>Date of Creation</b>	04/07/2018
<b>Last Review</b>	09/10/2024
<b>Next Scheduled Review</b>	09/10/2025
<b>Overview of Amendments to this Version</b>	
<b>Approved by Governors</b>	