



## Privacy Impact Assessment

### PRINCE OF WALES PRIMARY SCHOOL

#### Template for conducting a privacy impact assessment on surveillance camera systems (CCTV)

Principle 2 of the surveillance camera code of practice states that the use of a surveillance camera system must take into account the effect on individuals and their privacy, with regular reviews to ensure its use remains justified. The best way to ensure this is by conducting a privacy impact assessment before the system is installed and when a new camera is being added on to an existing system. This will assist in managing any privacy issues the use of the surveillance system might have.

A Privacy Impact Assessment looks at privacy in a wider context taking into consideration both the Data Protection Act and the Human Rights Act. The PIA considers the pressing need that the system seeks to address and the impact it may have on individual's privacy. It is important to decide whether the proposed system can be justified as proportionate to the needs.

In undertaking this Privacy Impact assessment we have taken into consideration our obligations under the Data Protection Act 2018 and followed the instructions issued in the ICO's CCTV code of practice.

This privacy impact assessment is specifically designed to demonstrate that we have regard to the surveillance camera code of practice under the PoFA. It also helps demonstrate our consideration of data protection and human rights obligations.

This PIA has been conducted as a completely separate exercise and it complements project planning or other management and review activities.

It is best practice to conduct a PIA and its scope and considerations have taken into account the nature and scope of the surveillance camera activities and to determine whether there is potential to impact on the privacy rights of individuals.

The PIA will be considered when we are reviewing our surveillance camera systems and when we are considering introducing new technology allied to them.

A Privacy Impact Assessment will be considered when any of the following apply:

- When we are introducing a new surveillance camera system and/or camera

- If we are considering introducing new or additional technology that may affect privacy (e.g. ANPR, Body worn cameras, remotely operated vehicles (drones)).
- When we are changing the location or field of view of a camera or other such change that may engage privacy concerns
- When we are reviewing our system to ensure that it is still justified. We aim to undertake this PIA review annually (See ICO CCTV Code of Practice and Surveillance Camera Code of Practice Principle 10)
- If we are considering the capture of an additional identifier such as vehicle registration mark to enable ANPR
- If the activity or change will engage heightened privacy concerns such as voice recording and biometric recognition such as facial and gait recognition.
- If our system involves any form of cross referencing to other collections of personal information
- If our system involves more than one company or agency undertaking activities either on our behalf or in their own right
- If we change the way in which the recorded images and information is handled, used or disclosed.
- If we increase the area captured by our surveillance camera system
- If we change or add an end user or recipient for the recorded information or information derived from it.

**Surveillance camera system being assessed:**

**(insert system name, location and CCTV register URN)**

**CCTV system name: Prince of Wales Primary School and Daycare**

**Location/site address: Salisbury Road, Enfield, Middlesex, EN3 6HG**

**Enfield CCTV Register URN: \_\_\_\_\_**

**Responsible system Manager: Nihan Sin Tel: 01992 762840**

**Date of assessment: November 2020 Review date: November 2021**

<b>Data Protection Act 2018 and Surveillance Camera Code of Practice</b>		
<b>1</b>	What is the organisation's purpose for using the CCTV and what are the issues that the system aims to address?	<b>Security; health and Safety; wellbeing of staff, pupils and visitors: Improving pupil behaviour; reducing vandalism</b>
<b>2</b>	Can CCTV technology realistically deliver these benefits?	<b>YES – there has been a significant reduction in behaviour incidents; pupils are mindful of the impact of their behaviour and have been seen to check equipment to then moderate their response.</b>
<b>3</b>	What are the views of those who will be under surveillance?	<b>Parents are pleased with the results as they are reassured their children are safe on site. They are also pleased that behaviour has improved. Governors are of same opinion and have been pleased with the results. Often parents often ask if an incident was captured to see evidence their child did behave inappropriately.</b>
<b>4</b>	Have other less privacy-intrusive solutions such as improved lighting been considered?	Yes. Improved lighting and other interventions but no impact made.
<b>5</b>	What are the benefits to be gained from using CCTV?	Ability to solve security issues, behaviour and other issues as outlined in 1 above.  Footage has been shared with police when assaults have been reported.
<b>6</b>	What are the privacy issues arising from this surveillance camera system?	None identified.
<b>7</b>	What privacy design features will be adopted to reduce privacy intrusion?	No cameras in toilet areas; cameras on school public site only. No cameras will be aimed at private areas such as residents' houses etc.
<b>8</b>	What organisations will be using the CCTV images and who will take legal responsibility for the data under the Data Protection Act 2018?	Authorised officers at school, the local police and insurance claims.

<b>9</b>	Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?	YES
<b>10</b>	Will the CCTV equipment being installed and the system of work being adopted be sustainable? Is there sufficient funding for the scheme?	YES
<b>11</b>	Will the particular system/equipment being considered deliver the desired benefit now and in the future?	YES
<b>12</b>	What future demands may arise for wider use of Images and how will these be addressed?	<b>NONE</b>
<b>Human Rights Act 1998</b>		
<b>1</b>	Is the system established on a proper legal basis and is it operated in accordance with the law?	YES
<b>2</b>	Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?	YES plus behaviour incidents and vandalism.
<b>3</b>	Is it justified in the circumstances?	YES
<b>4</b>	Is it proportional to the problem that it is designed to deal with?	YES
<b>5</b>	Do any of these measures discriminate against any particular sections of the community?	NO