



Privacy Impact Assessment – Full assessment

This document will assist in recording the PIA process and results following completion of the screening questions above. The document should be completed prior to any project commencing and should be updated throughout the course of a projects life.

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|-----------------------------------|-------------------|
| Name (person completing the form) | Mark Smith |
| Position | Marketing Manager |
| Project lead | Adam Cartwright |
| Position | ICT Technician |
| Team & department | Business Team |
| Date of completing form | 24/03/2016 |

Note: Some or all of the information provided in this document may be subject to disclosure and/or publication under the Freedom of Information Act 2000.

Step 1: Identify the need for a Privacy Impact Assessment

*Explain what the project aims to achieve, what the benefits will be to the organisation, to individuals and to other parties.
Summarise why the need for a Privacy Impact Assessment was identified (draw on answers from the screening questions).*

The project aims to enhance safeguarding and security of Wolgarston High School

The project will use a network of CCTV cameras and a recording device on which video images are stored. All cameras will be located in spaces at the school to which staff, students and visitors are all admitted freely.

Due to potential concerns about the collection of images this PIA is being completed.

Step 2: Describe the information flows

The –collection, use and deletion of personal data should be described. You may want to refer to a flow diagram to explain the data flow. You should say how many individuals are likely to be affected by the project.

1. The cameras will be installed in the Easter holidays 2017 and activated in advance of the Summer Term 2017.
2. They will constantly (24hours) record.
3. The cameras will cover a large portion of the indoor communal area of the school.
4. The cameras will all be visible.



5. The cameras will be located in corridors and social areas, but not have vision directly into staff and student toilets.
6. The cameras will provide an image of sufficient quality to mean that individuals and their actions will be clearly identifiable.
7. The cameras will be recorded, but not constantly monitored 'live'.
8. Prior to entering an area with a camera a sign will be clearly displayed.
9. All current students, parents and staff will be informed about the cameras via standard communication channels such as newsletters.
10. All new students, parents and staff will be informed as part of the induction process.
11. All visitors will be presented with a clear information sign in visitor reception to alert them to the presence of recording cameras around the premises.
12. All recordings will become the property of Wolgarston High School and will be kept for as long as the school sees fit.
13. The recordings may be provided to outside agencies such as social workers or the police if the content is relevant to an investigation. This provision is to occur solely under the strict instruction of the Designated Safeguarding Lead for the school.

Consultation requirements

Explain what practical steps you will take to ensure that you identify and address privacy risks. Who should be consulted, internally and externally? How will you carry out the consultation?

- Senior Leaders met to discuss the need for CCTV to eliminate low level disruption, criminal damage and theft.
- CCTV is used in many schools so we have sought advice from neighbouring schools with installed systems
- This Privacy Impact Assessment (PIA) will be available to everyone via our website.
- All current staff, students and parents will be informed about the project, the reasons for it and its implications
- A thorough network of signage will be clearly displayed to ensure that anyone who may subject to recording is fully aware.

Step 3: Identify the privacy and related risks

Identify the key privacy and corporate risks. (NB: Compliance risks will be completed by IGU)

| Privacy risk | Risk to individuals | Compliance risk | Associated organisation/corporate risk |
|--|---|--|--|
| E.g. Intrusion of privacy, data loss, unauthorised use of data | E.g. Unable to use service, damage and/or distress, risk of physical harm | E.g. Breach of DPA, HRA, Confidentiality | E.g. Regulatory action, reputational damage, loss of trust |
| Intrusion of privacy | | | Loss of trust |
| Loss of data | | | |



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Step 4: Identify privacy solutions

Describe the actions you could take to reduce the risks, and any future steps which would be necessary, e.g. the production of new guidance or future security testing for systems.

| Risk (as identified above) | Solution(s) E.g. training, policy update, agreement/contract NB: There may be more than one possible solution for each risk | Result Is the risk eliminated, reduced or accepted |
|-----------------------------------|---|--|
| Intrusion of privacy | Installation of signage Proper communication of purpose | Risk is eliminated |
| Loss of data | Storage resilience The footage will be kept for a maximum amount of time of 12 months on the school system. Access to these files will only be allowed to specified members of staff who are part of the school system. Backups will take place each night and firewall rules mean no one from outside the network can access. | Risk is reduced |
| Loss of trust | Senior Leaders are fully briefed as to how project works and how data is collected, used and stored All external communications regarding the project to be managed by Marketing Manager | Risk is reduced |

Step 5: Sign off and record the PIA outcomes

Who has approved the privacy risks involved in the project? Which of the solutions identified above need to be implemented?

| Risk (as identified above) | Approved solution | Approved by |
|-----------------------------------|------------------------------|----------------------------|
| Intrusion of privacy | Explanation communication to | Julie Ablewhite – Business |

