CCTV Data Protection Impact Assessment

1. Identify the need for a CCTV DPIA

1.1 What is the aim of the project?

CCTV delivers benefits in terms of improved health and safety and security. The Academy's use of CCTV aims to achieve the following:

- Improve the health and safety and security of students, staff, and visitors.
- Protect the Academy premises.
- Reduce vandalism.
- Provide assistance in the detection and prevention of crime.

Students, parents and staff have the assurance that these measures increase safety and security of Academy premises.

1.2 Why is CCTV data captured?

Sharpe CCTV cameras are in place purely for security, both for our premises and equipment and for the safety & security of our staff, students and visitors. Data is stored for 30 days and used only in the case of an incident.

Sharpe Reception

This camera points internally towards the main entrance to the Sharpe HQ studio and captures data in the Reception area only.

Sharpe Student Hub

This camera is situated in order to cover the internal main entrance to this building, and also the entrance to our recording studio and editing suite.

Outside Sharpe Reception and Student Hub

This camera is situated externally in order to cover the outside entrances to the Sharpe HQ building and Student Hub. The camera is positioned so it does not capture any data from the wider Harrow Arts Centre campus.

Sharpe Student Accommodation – The Loft

A camera is situated outside the front door and is in place primarily for student security, as well as security for the property. The camera covers the front door and front patio area of the property only. The camera does not capture data inside any house and, through the use of activity zones, do not capture data of the general public outside of the property boundaries.

2. Describe the processing

2.1 What is the source of the data?

The CCTV system will provide the Academy with video pictures, including audio, from the following locations:

- THREE fixed based cameras located internally and externally throughout the Academy's premises at Harrow Arts Centre.
- ONE fixed based camera located externally at the Academy's student house, The Loft.
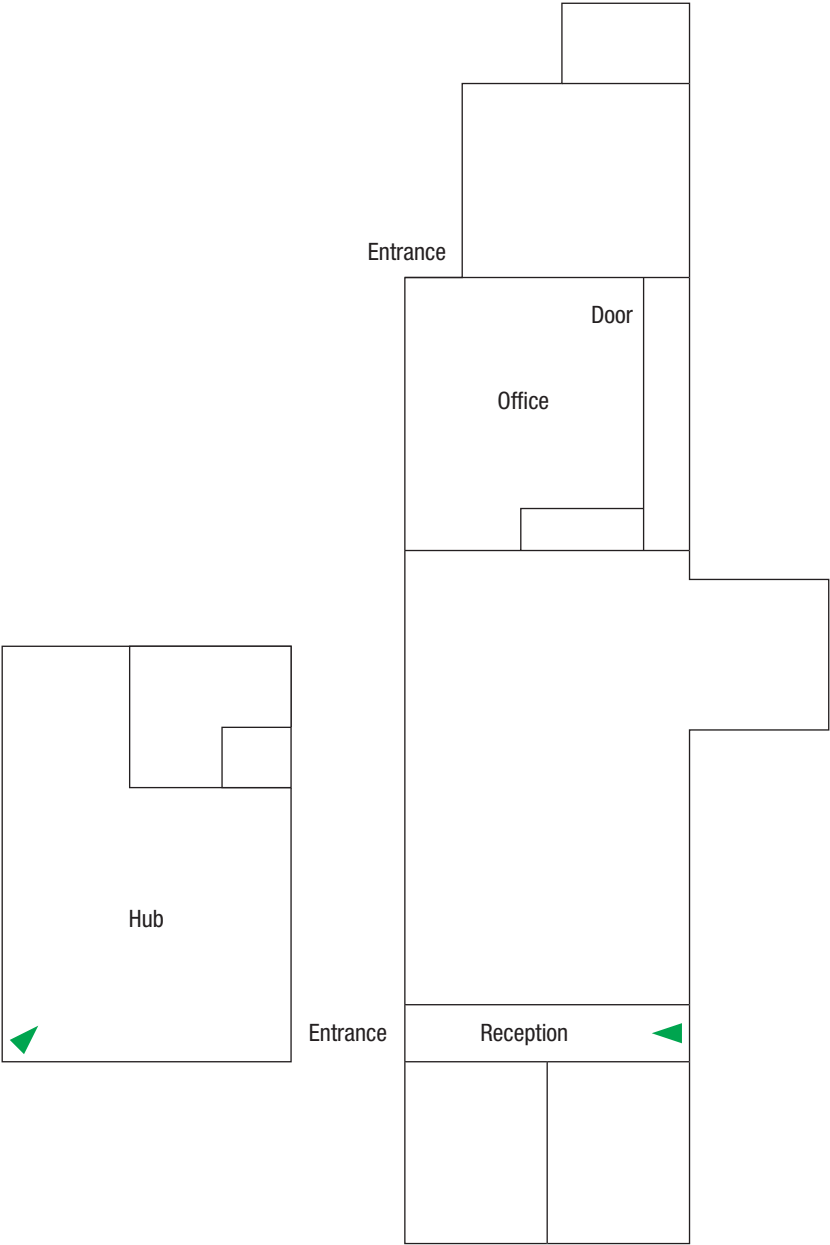
The images and audio are transmitted to the secure storage facilities of the camera providers – Hive and Arlo.

The transmitted images and audio can be viewed live via the camera provider's smart phone app. Access to these recordings is strictly limited to designated persons, specifically the Academy's Senior Management Team – Daniel Sharpe and Nick Jackson. This helps to maintain site security, access control, pupil and staff safety.
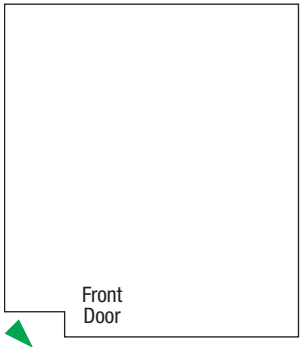
All of the CCTV cameras are fixed on a particular scene. The location of each CCTV camera is as follows:

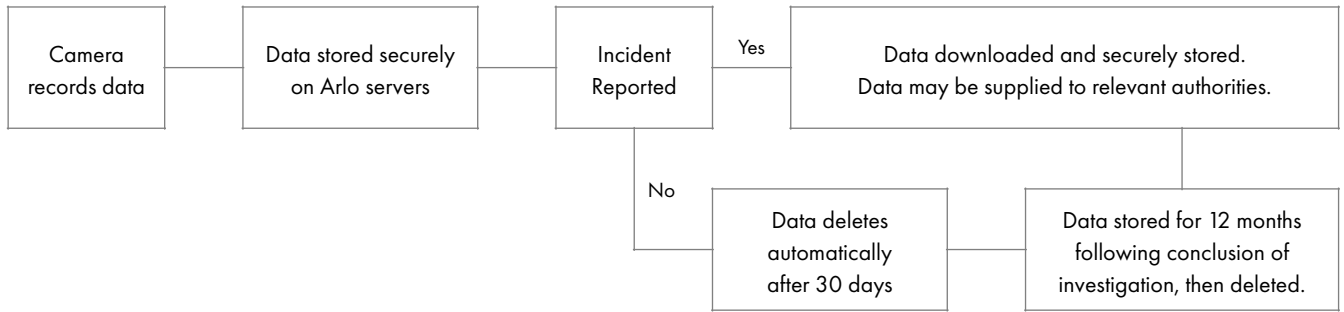| Location	Internal/external	Viewpoint	Sound	Pan/Zoom	Operation hours
Sharpe Reception	Internal	Reception area including entrance door.	Yes	No	24 hours
Sharpe Hub	Internal	Full floor area including main entrance door.	Yes	No	24 hours
Sharpe Reception and Hub	External	Outside entrance doors to Sharpe HQ and Hub buildings.	Yes	No	24 hours
Student House – The Loft	External	Front paved area including front door.	Yes	No	24 hours

Sharpe HQ & Hub

Student House – The Loft

2.2 **Data Flow**

| Camera records data | — | Data stored securely on Arlo servers | — | Incident Reported | Yes | Data downloaded and securely stored. Data may be supplied to relevant authorities. |

No → Data deletes automatically after 30 days — Data stored for 12 months following conclusion of investigation, then deleted.

2.3 **How will you use the CCTV data?**

CCTV data is used to ensure the health & safety and security of students, staff and visitors. The presence of CCTV cameras acts as a crime prevention method.

CCTV cameras can be used to detect unauthorised visitors and protection of damage to Academy assets. In the event of an incident, e.g. crime, data may be shared with the Senior Management Team and/or local authority and/or police for investigation and enforcement purposes.

2.4 **How will you store the CCTV data?**

CCTV camera recordings are stored securely on the camera provider's secure servers. Sharpe Academy uses the Arlo system (arlo.com) for our CCTV systems.

Data will be downloaded and stored on Sharpe Academy's secure systems (Microsoft OneDrive, Dropbox or Apple iCloud Drive) ONLY in the event of an incident which requires further investigation. These systems require password access, and any downloaded data files will themselves be password protected.

2.5 **How will you delete the CCTV data?**

CCTV recordings are deleted from the camera provider's secure storage automatically after 30 days.

2.6 **What is the nature of the data?**

The CCTV data captured is video recordings.

2.7 **Special Category data**

By default the CCTV may be picking up special category data including race/ethnic origin and the health of an individual. By limiting storage and access of the data to the conditions described in 2.3 above, any risks associated with capturing data is minimised.

2.8 **How much data is collected and used and how often?**

The CCTV is operational 24 hours a day, 7days a week. Recording is initiated upon detection of movement in the area being monitored.

2.9 **How long will you keep the data for?**

Recorded data will be retained for 30 days unless requested as part of an incident investigation and then stored on archive for 12 months from the conclusion of any such investigation. The Data Management System automatically deletes the information after 30 days.

2.10 **Scope of data obtained?**

The CCTV data is obtained within the confines of the Academy premises and/or the Academy's student accommodation communal outdoor areas.

2.11 **What is the nature of your relationship with the data subjects?**

The Academy provides education to its students on a term time basis. The Academy may receive a number of visitors on a daily basis including contractors, inspectors, examiners, support and agency staff, etc.

2.12 **How much control will they have?**

Sharpe Academy informs students, parents, staff, visitors and any potential data subjects that CCTV is in use by use of signage at the location of all cameras.

The CCTV system does not use any form of facial recognition or identifying .

A data subject may make a written request for a copy of the recorded data in which they appear.

2.13 **Where are the cameras located?**

Cameras are located:

a)   in areas of the Academy campus where students and staff have access.

b)   in external communal area of the Academy student accommodation where students, visitors and potential intruders gain access to the property.

Cameras are not located in areas where privacy is expected. There are no cameras in toilet areas, changing rooms, and there are no cameras aimed at private areas such as residents' houses, etc.

2.14 **Are there prior concerns over this type of processing or security flaws?**

Use of the CCTV system is proportionate and justified. It is also achieves for the Academy the following benefits:

a)   Demonstrates a duty of care to its students, staff, and visitors;

b)   Protects the fabric of the Academy both externally and internally;

c)   As a consequence of this, budgets can be reduced/deferred to other Academy projects;

d)   Encourages improvements in student behaviour;

e)   Provides assistance in the detection and prevention of crime;

f)   Assists in managing the Academy.

3.   Consultation process

3.1   The views of students, parents and staff will be obtained. Once reviewed, the views of these parties will be taken into account when considering whether any adjustments to the Academy's current CCTV use are justified.

4.   Assess necessity and proportionality

4.1   **What is the lawful basis for processing?**

The lawful basis for processing includes the following:

- Article 6 and Article 9 (Special Category Data) under Data Protection Law;
- The Common Law Duty of Care;
- Health and Safety at Work Act;
- Safeguarding Vulnerable Groups Act;
- Working together to Safeguard Children Guidelines (DfE).

4.2   **Does the processing achieve your purpose?**

Cameras are located in areas where students, staff and visitors have access. Cameras are not located in areas where privacy is expected.

4.3   **Is there another way to achieve the same outcome?**

Staff are present during all Academy operational hours, however this cannot provide an equally constant protection or deterrent which is given by the presence of CCTV monitoring.

4.4   **How will you ensure data quality and data minimisation?**

By limiting storage of data to the camera provider's secure systems, and by not downloading any data except in the conditions set out in section 2.3, the Academy minimises any risk of a data breach.

4.5   **What information will you give the individuals?**

The Academy informs students, staff and visitors, by way of signage, that CCTV is in use.