



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.

Name (person completing the form)	Mark Smith
Position	Marketing Manager
Project lead	Richard Davenport
Position	Senior ICT Technician
Team & department	Business Team
Date of completing form	07/04/2016

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 Penkridge Middle 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 Summer Term 2017 and activated immediately.
2. They will constantly (24hours) record.
3. The cameras will cover a large portion of the indoor communal area and much of the grounds 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 Penkridge Middle 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
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Intrusion of privacy	Explanation communication to all parents, staff and students Awareness raising of project and its aims Approval of wording for CCTV signs from legal advisers	Julie Ablewhite – Business Manager
Loss of data	Hardware and software purchased from CCTV specialists based on advice from another school using similar system	Julie Ablewhite – Business Manager
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	Julie Ablewhite – Business Manager
<p>Step 6: Integrate the PIA outcomes back into the project plan</p> <p><i>Who is responsible for integrating the PIA outcomes back into the project plan and updating any project management paperwork? Who is responsible for implementing the solutions that have been approved? Who is the contact for any privacy concerns which may arise in the future?</i></p>		
Action to be taken	Date for completion of actions	Responsibility for action
Future privacy concerns / project developments	As required	Adam Cartwright – ICT Technician Mark Smith – Marketing Manager