



OFFICE OF THE BIOMETRICS AND SURVEILLANCE CAMERA COMMISSIONER

Professor Fraser Sampson
Biometrics and Surveillance Camera
Commissioner
2 Marsham Street
London SW1P 4DF

09 May 2023

<https://www.gov.uk/government/organisations/biometrics-and-surveillance-camera-commissioner>

To: [redacted]

Reference: BSCC-FOI-0923-HD

Letter by email

Dear [redacted]

I write in response to an email received from you to our office on 27 April 2023 in which you ask for all correspondence/notes to/from or relating to Cotham School in relation to their use of CCTV from February 2022 to present. Your request has been handled as a request for information under the Freedom of Information Act 2000.

In answer to your request, please see copies of all relevant documents held by this office, which are annexed to this letter. Please note that, where redactions have been made, they are made under section 40(2) relating to personal information. It is the policy of the Home Office to withhold the names of officials below the level of Senior Civil Servant and, as an arms-length body of the Home Office, OBSCC also follows this policy. I can confirm that the redactions relate to names and email addresses that would confirm the identity of the individual, or where additional opensource research could provide the identity of the individual (for example, where a person's position or role is disclosed).

If you are dissatisfied with this response, you may request an independent internal review of our handling of your request by submitting a complaint within two months to the address

below, quoting reference BSCC-FOI-0923-HD. If you ask for an internal review, it would be helpful if you could say why you are dissatisfied with the response.

[redacted]

As part of any internal review, our handling of your information request will be reassessed by staff who were not involved in providing you with this response. If you remain dissatisfied after this internal review, you would have a right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act.

Yours sincerely,

Fraser Sampson
Biometrics and Surveillance Camera Commissioner
Email: enquiries@obscc.org.uk

Annex of information held

From: JONES, Darren <darren.jones.mp@parliament.uk>

Date: Thursday, 6 October 2022 at 13:35

To: [redacted]@cotham.bristol.sch.uk <[redacted]@cotham.bristol.sch.uk>

Subject: Letter to [redacted]

Dear Cotham School –

Please find attached a letter for the attention of [redacted].

Please can you confirm receipt.

Many thanks

Darren

Darren Jones MP
Chair, Business, Energy and Industrial Strategy Committee
Member of Parliament, Bristol North West

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FW: Letter to [redacted]



JONES, Darren <darren.jones.mp@parliament.uk>
To: Enquiries

Reply Reply All Forward ...

Fri 07/10/2022 10:04

You forwarded this message on 07/10/2022 13:32.

Letter from Darren Jones MP to Cotham School - CCTV - 6 Oct 22.pdf
222 KB

Do you trust this email? This email originated from outside the inquiry, or came from a system that has not been certified. Please exercise caution before opening attachments or clicking on links within this email or any suspicious email, particularly from unknown senders.

Dear Professor Sampson –

My constituents have asked me to refer an issue to you, regarding a Bristol school installing covert CCTV cameras which have been filming members of the public on a shared site for some time without any public notice.

You can see the letter I sent to the school yesterday attached, and you can read some of the local reporting here:

<https://www.bristol247.com/news-and-features/news/school-admits-carrying-out-covert-cctv-surveillance-public/>

I'd be grateful if someone in your enforcement team could liaise with the school to ascertain the facts and then let me know whether any action can or will be taken.

Many thanks

Darren

Darren Jones MP
Chair, Business, Energy and Industrial Strategy Select Committee
Member of Parliament, Bristol North West



Darren Jones MP
Member of Parliament for Bristol North West
House of Commons, London SW1A 0AA

●
[REDACTED]
Cotham School
Cotham Lawn Road
Cotham
Bristol
BS6 6DT

6th October 2022

Sent by e-mail only.

Dear [REDACTED] –

Covert surveillance at Stoke Lodge

I'm writing on behalf of constituents who have, I understand, been secretly filmed via covert surveillance cameras installed by Cotham School at Stoke Lodge.

I appreciate that you wished to prevent criminal activity from taking place on the site, activity which I clearly do not condone, but this should be done in a legal way. I understand that Cotham School installed covert cameras in a concealed manner on the site without any public notice and proceeded to secretly film my constituents. The installation of covert cameras in this way is clearly a breach of your data protection law obligations and may be more seriously a breach of other legislation relating to surveillance and the use of CCTV cameras. I'm genuinely at a loss to understand why Cotham School thought this an appropriate thing to do, not least given that you are currently requesting planning permission from Bristol City Council for more traditional CCTV.

I am therefore copying the Information Commissioner and the CCTV Commissioner to ask them to engage with you directly and to report to me in due course. In the meantime, I strongly advise you to turn off the cameras that you have installed on the site.

I note from public reporting that you have suggested Avon and Somerset Police advised you to install these covert cameras. Given the regulatory requirements associated with CCTV I find that hard to believe. I have therefore copied the Avon and Somerset Police and Crime Commissioner to ask that he advise me on what, precisely, Avon and Somerset Police advised you to do.

Constituents will understandably feel very strongly about having been monitored in this way and I trust that you will engage with them in good faith in answering their questions, requests for data and any complaints or legal processes that might follow.

I really am very sorry that I am having to engage with you in this way once again. I'd much rather support you in the important service you're tasked with delivering – educating our children.

DARREN JONES MP

- Information Commissioner
- CCTV Commissioner
- Avon and Somerset Police and Crime Commissioner

Your Voice in Parliament. Your Champion in Bristol
darren.jones.mp@parliament.uk | @darrenjones | fb.com/darrenjonesmp
www.darren-jones.co.uk

RE: Letter to [REDACTED]



Enquiries <enquiries@obscc.org.uk>
To: JONES, Darren

Reply Reply All Forward ...
Fri 07/10/2022 13:30

Dear Darren,

Many thank you for your email to our office and for raising this with us.

I am responding on behalf of the Commissioner, to make you aware that unfortunately our responsibility extends to the overt use of surveillance camera systems in public space by police and local authorities. While the use as reported here appears to involve both the police and the local authority, the surveillance is deliberately covert.

However, the Commissioner believes that all surveillance camera activity undertaken by the police and local authorities needs to be lawful, accountable and conducted in a way that the public would expect, to a standard that maintains their trust and confidence.

To that end, and having noted what you state regarding the school's Data Protection Impact Assessment, responsibility for enforcement of any breach of the data protection framework sits with the Information Commissioner with whom we work closely and therefore we will forward your correspondence to our contacts there.

Thanks again and kind regards,

[REDACTED]

FW: Letter to [REDACTED]



Enquiries <enquiries@obscc.org.uk>
To: [REDACTED]

Reply Reply All Forward ...
Fri 07/10/2022 13:33

Letter from Darren Jones MP to Cotham School - CCTV - 6 Oct 22.pdf
222 KB

Hi [REDACTED],

We received this email earlier RE covert use of surveillance in a school.

The school state that A&S police asked them to install it but the MP that sent this states in his letter (attached) that he finds this hard to believe. We have sent a response thanking them for drawing our attention to the matter however it falls outside of our remit.

The ICO are mentioned at the end of the letter so you may have already been notified however just forwarding to you in case you haven't, as it mentions a breach in the DPA.

Kind regards,

[REDACTED]

Cotham School, Bristol - CCTV Query

EC [redacted]@cotham.bristol.sch.uk
To: Enquiries
Cc: [redacted]

Reply Reply All Forward ...
Mon 10/10/2022 16:41

If there are problems with how this message is displayed, click here to view it in a web browser.

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Hello,
I was hoping to speak to someone in relation to a CCTV query at Cotham School, Bristol but I am unable to find a contact number to call.
Please can you let me know if there is a number that I can call somebody on.
Many thanks.
Kind regards,

[redacted]
Cotham School | Cotham Lawn Road | Bristol | BS6 6DT
Telephone: [redacted]
Email: [redacted]@cotham.bristol.sch.uk
Helpdesks: [IT Services Team](#) | [Site Services Team](#) | [Health & Safety](#)

PARKING - May we remind visitors there is no on-site parking at the school. Parking is available offsite in accordance with the Cotham Residents Parking Scheme.

<https://www.bristol.gov.uk/parking/cotham>

Urgent CCTV query from Cotham School, Bristol

SI School Info <info@cotham.bristol.sch.uk>
To

Reply Reply All Forward ...
Thu 13/10/2022 14:48

If there are problems with how this message is displayed, click here to view it in a web browser.

- A letter from Cotham School regarding CCTV.pdf (201 KB)
- Appendix 3 - CCTV Policy.pdf (144 KB)
- Appendix 5 - Data Protection Impact Assessment (DPIA) for CCTV v1.2.pdf

Do you trust this email? This email originated from outside the Inquiry, or came from a system that has not been certified. Please exercise caution before opening attachments or clicking on links within this email or any suspicious email, particularly from unknown senders.

To whom it may concern,
Please find the attached letter and referenced appendices from Cotham School.
We look forward to hearing from you in due course.
Kind regards,

[redacted]

PARKING - May we remind visitors there is no on-site parking at the school. Parking is available offsite in accordance with the Cotham Residents Parking Scheme.

<https://www.bristol.gov.uk/parking/cotham>

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Providing a life-enhancing education that develops the character, talents and potential of every child

ACHIEVEMENT ~ DIVERSITY ~ RESPECT

Headteacher: Ms Jo Butler

13 October 2022

To whom it may concern

We are writing to you to seek your help in providing urgent clarification regarding the CCTV system in operation at Cotham School. We are seeking this clarification following two recent complaints from the public regarding the specific use of two CCTV cameras.

To provide some background context to the situation, Cotham School is made up of three sites; our main school site on Cotham Lawn Road, our Post 16 Centre at Chamwood House and our outdoor classrooms at Stoke Lodge. The school uses a single CCTV system across these three premises and has both a CCTV policy and Data Privacy Impact Assessment (DPIA) in place for the use of CCTV.

The original CCTV installed at the school was done so when the school was Local Education Authority Maintained under the control of Bristol City Council. The school was subject to the Building Schools for the Future Programme (BSF) led by Bristol City Council between September 2008 and August 2011, at this time the school was subject to a significant refurbishment including the construction of several new buildings. As a part of this building project, the number of CCTV cameras increased and this increase was identified in the plans that were provided as part of the public consultation that the school held as part of the planning process. At this point, the school would have used the Bristol City Council CCTV Policy as a Local Education Authority Maintained School as opposed to having developed its own.

In August 2011, the school became a stand-alone academy and at this time Cotham School moved away from the control of the Local Education Authority. In May 2012 the school adopted its own CCTV policy broadly based on the historic policy provided to the school by Bristol City Council with some additions and adaptations.

In January 2019, following the appointment of the school's external Data Protection Officers (One West) and the recent introduction of the General Data Protection Regulation (GDPR) the school produced, under the

Cotham School, Cotham Lawn Road, Bristol, BS6 6DT | 0117 919 8000 | info@cotham.bristol.sch.uk | www.cotham.bristol.sch.uk



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Registered in England: Company Number 07732888.
Registered Office: Cotham School, Cotham Lawn Road, Cotham, Bristol BS6 6DT



guidance of One West, a new CCTV policy and created a Data Privacy Impact Assessment for the school's CCTV system.

Throughout the school, across the school's three sites, the purpose of CCTV is several preventative measures, these are:

- the prevention of crime and antisocial behaviour
- the prevention of bullying
- the safeguarding of our staff and students
- maintaining our statutory requirements as an employer under the Health and Safety at Work Act 1974
- the protection of Cotham School and its property

The Complaints

We have recently received two complaints specifically concerning the school site at Stoke Lodge, our outdoor learning space mainly used for the delivery of Physical Education. The school site at Stoke Lodge has the same designation as the two other school sites; they are all private property. As with most Academy schools in England, the land at each location is owned by the Local Authority and leased to the school on a 125-year lease and has been since the academisation in 2011. Following security, safeguarding of student and staff issues and continued health and safety and criminal damage incidents the school decided the only way of reducing these hazards to a minimum would be to install a perimeter fence at the Stoke Lodge site, this brought the site in line with the other two school sites, that both have perimeter fencing. The fence at the Stoke Lodge site was installed between January 2019 and March 2019.

The local public found the installation of the fence difficult to accept as it provided instant restrictions to their access to the school site which was always the purpose of installing it. There was therefore significant resistance to the installation of the fence. The school, to combat the resistance, agreed to allow permissive public access at times when the fields are not in use by the school or its hirers. The school publishes the opening times for the fields on its website and our social media channels so the local community is aware of the times that the field is open to them. This works using an access control system and the gates are set on a timer to automatically lock and unlock in harmony with our published times.

As with all of our school premises, there has been a continuation of the measures used to reduce or remove the hazards identified at the Stoke Lodge site. This was the installation of CCTV. This happened as needs have been identified that needed combating. CCTV cameras were first installed at the school playing field site at Stoke Lodge in March 2019, working in conjunction with the fence. The installation consisted of three domes mounted on the Groundsman hut at one end of the field.

The school has a building at its Stoke Lodge site but this was, unfortunately, subject to an arson attack before the installation of the fence and was unable to be used by the school. In May 2020 the school received confirmation from the Department for Education that a Condition Improvement Fund (CIF) bid had been approved for a full refurbishment of the Pavilion building. In May 2021 the school accepted the handover of



the refurbished Pavilion building. When this was handed over from the building contractor there were then three further CCTV cameras as per the refurbishment plans installed on the building. There have been no complaints since the dome cameras or the cameras on the refurbished pavilion building have been installed.

Since the installation of the fence in 2019 it has sustained ongoing criminal damage. The school has diligently reported this to Avon and Somerset Police, who decided to visit the school to discuss further preventative measures in January 2022. Avon and Somerset Police suggested at that meeting that further CCTV should be installed on the school's premises to try and catch images of the perpetrators undertaking the criminal damage. This was designed to bring this matter to an end and cease the waste of school time and public money that each incident was causing. In response to their suggestions at the meeting, the school installed two discreetly placed overt CCTV cameras into a metal street cabinet on the playing field. They are facing the fence and gates where the majority of the criminal damage was being committed. The installation took place in January 2022. It is these two most recently installed cameras which have generated the two complaints to the school that we are writing to you about.

The cameras only record within the school's premises but they are set to record twenty-four hours a day as criminal damage to the school's property only occurs when the school allows permissive use by the public during the day or at weekends or overnight when the gates are locked. Often damage has happened as a result of a breach of the fence or the gates during the locked period. The use of all CCTV on all the school premises is made clear to everyone who enters the school site and this is particularly clear at the Stoke Lodge site. The general public who may wish to use the site cannot enter without seeing the clear signage at each of the entry points. The signage indicates that the CCTV is in operation and recording takes place 24 hours a day, every day.

The CCTV installations across all three school sites have consistently taken into consideration the 12 principles code of practice published by the Surveillance Camera Commissioner and both the school and our Data Protection Officer are satisfied that we fully comply with those principles. All of the CCTV installations are targeting crime and not an individual or group of people. The footage is never live monitored and is only ever reviewed should school staff find that a crime has been committed or should the school receive reports that an incident has taken place.

Our published Data Protection Impact Statement attached advises the school community and the public that:

- CCTV helps protect school property and provides an additional layer of assurance regarding the safety of pupils, staff and visitors through deterring potential incidents. It may support the police in a bid to deter and detect crime and in identifying, apprehending and prosecuting offenders.
- Cotham School will ensure the security of the data processed in line with Article 5(1)(f) of The GDPR which requires that personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.
- Footage is retained for 30 days before it is automatically deleted by the system.



- Yes, there are appropriate signs which inform the public when they are in an area covered by surveillance camera systems

The purpose of this letter is to seek clarity from you as to whether or not in your opinion the school has:

- been conducting as alleged in the two complaints "covert surveillance"
- whether or not the signage which has been in place since 2019 as described above enables the recordings to be described as overt.

The school and its data protection officers feel that the school has acted legally and honestly and we are now seeking clarification from your body so that we can state that in our response to the complainants.

We attach several appendices to this letter to help you better understand how we have managed our installation and use of CCTV. They also show how the decision-making process took place before, during and after the installation of the CCTV in question.

Attached are:

1. A photograph of the street cabinet on our playing fields which houses the discreetly placed overt CCTV cameras.
2. Photographs of the five gates to the playing fields. All of these have the same signage on, depicting the permissive public access to the playing fields when they are not in use by the school and the CCTV warning signs that are in place which indicate that CCTV is in operation and recording takes place 24 hours a day, every day.
3. A copy of the Cotham School CCTV Policy.
4. A copy of the Cotham School Data Privacy Impact Assessment (DPIA) for CCTV (Original - January 2020)
5. A copy of the Cotham School Data Privacy Impact Assessment (DPIA) for CCTV (Revised - January 2020)

The school and our Data Protection Officer are currently reviewing the existing CCTV Policy and Data Protection Impact Assessment (DPIA) for CCTV as a result of the two complaints received to see if we can do more to make our use of CCTV clearer. Any input that you can provide to this review would be greatly appreciated by the school.

We look forward to hearing from you in due course.

Yours sincerely



CCTV Policy

Version	Date	Summary of Changes
1.0	01/05/2012	Initial version
1.1	01/05/2018	Updated for GDPR Compliance
1.2	01/09/2019	Introduction to the use of body worn cameras (Point 1.3) Updated expiry date of ICO registration (Point 1.9)

Approved by Governors: May 2018
Review Date: May 2021

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Introduction

Cotham School uses closed circuit television (CCTV) images to reduce crime and monitor the school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to school property.

The system comprises of a number of fixed and dome cameras.

The system may extend to the use of portable body worn cameras in high-risk areas where fixed cameras are unable to reach.

The system does not have sound recording capability other than in the Main School Reception area

The CCTV system is owned and operated by the school

The CCTV is monitored centrally from the Facilities Office by the Site Services and IT Services Team.

Daily checks are carried out by the Facilities Manager and IT Services Manager to ensure that the system is working properly and is producing high quality images.

The school's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998. The use of CCTV, and the associated images and any sound recordings, is covered by the Data Protection Act 1998. This policy outlines the school's use of CCTV and how it complies with the Act

Notification of the system has been submitted to the Information Commissioners Office (ICO) on 16/01/2002 and the renewal date for this is 15/01/2022.

All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the IT Services Manager or Facilities Manager in their responsibilities under the CCTV Code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images

This policy covers Cotham Schools three sites;

- **Cotham School**, Cotham Lawn Road, Cotham, Bristol, BS6 6DT
- **North Bristol Post 16 Centre**, Charnwood House, 30 Cotham Park, Bristol, BS6 6BU
- **Stoke Lodge Playing Fields**, West Dene, Bristol, BS9 2BH

Statement of Intent

The school complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use. The Code of Practice is published at: <https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

CCTV warning signs will be clearly and prominently placed at all external entrances to the school. In areas where CCTV is used, the school will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The planning and design has endeavoured to ensure that the Scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Siting the Cameras

Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The School will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act.

The school will make every effort to position cameras so that their coverage is restricted to the school premises, which may include outdoor areas.

Members of staff should have access to details of where CCTV cameras are situated.

Storage and Retention of CCTV images

Recorded data will not be retained for longer than is necessary. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.

All retained data will be stored securely.

Access to CCTV images

Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

Except for law enforcement bodies, images will not be provided to third parties.

Subject Access Requests (SAR)

Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

All requests should be made in writing to the Headteacher. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

The school will respond to requests within 40 calendar days of receiving the written request and fee.

A fee of £10 will be charged per request.

The school reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an ongoing investigation.

Access to and Disclosure of Images to Third Parties

There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and service providers to the school where these would reasonably need access to the data (e.g. investigators).

Requests should be made in writing to the Headteacher

The data may be used within the school's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

Complaints

Complaints and enquiries about the operation of CCTV within the school should be directed to the Headteacher in the first instance.

Further Information

Further information on CCTV and its use is available from the following:

- CCTV Code of Practice Revised Edition 2008 (published by the Information Commissioners Office)
- www.ico.gov.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- Data Protection Act 1998

Monitoring and review

- This policy will be reviewed every three years.
- Any incidents occurring during the school year will be evaluated and where necessary appropriate action will be taken to amend the policy accordingly.



Data Protection Impact Assessment (DPIA) for CCTV

Version	Date	Summary of Changes
1.0	02/12/2019	Initial version
1.1	11/01/2021	Annual review. Document reformatted. Contents page added.
1.2	19/01/2022	Amendment of job roles. Removal of body worn video. Removal of sections relating to covert CCTV use following advice to use covert CCTV from Avon and Somerset Police.

Approved by Governors: 02/12/2019

Review Date: Ongoing annual review

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Level One Assessment

Location of surveillance camera system being assessed:

This data protection impact assessment applies to the CCTV used at Cotham Schools three sites;

- **Cotham School**, Cotham Lawn Road, Cotham, Bristol, BS6 6DT
- **North Bristol Post 16 Centre**, Charnwood House, 30 Cotham Park, Bristol, BS6 6BU
- **Stoke Lodge Playing Fields**, West Dene, Bristol, BS9 2BH

Date of assessment

Review date

Name of person responsible

Name of Data Protection Officer

GDPR and Data Protection Act 2018 and Surveillance Camera Code of Practice

1. What are the problems that you need to address in defining your purpose for using the surveillance camera system?

CCTV will be used to provide safety assurance to staff and pupils at the school. Monitoring may allow staff to identify and deter incidents where staff may not be present. Footage will also assist in any post incident evaluation. Where necessary cameras may be used for the prevention and detection of crime and anti-social behaviour and for the protection of school property. For example through deterring vandalism, bullying and discouraging anti-social behaviour including alcohol and drug related issues. Footage may also be used or shared with law enforcement bodies where necessary for the apprehension and prosecution of offenders. There have been a number of break-ins on the Main School Campus, particularly in areas where IT equipment is used. In addition to this there have been a number of issues with antisocial behaviour, criminal damage and vandalism at our offsite playing fields, Stoke Lodge.

2. Can surveillance camera technology realistically mitigate the risks attached to those issues?

CCTV helps protect school property and provides an additional layer of assurance regarding the safety of pupils, staff and visitors through deterring potential incidents. It may support the police in a bid to deter and detect crime and in identifying, apprehending and prosecuting offenders.

Cotham School Data Protection Impact Assessment (DPIA) for CCTV

3

data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

In line with the Data Protection Act 2018 Schedule 1 Part 2, one or more specific 'substantial public interest' conditions for Article 9(2)(g) will apply. This may be, but is not limited to:

- DPA 2018 Schedule 1, Part 2, Para 6: Statutory etc and government purposes
- DPA 2018 Schedule 1, Part 2, Para 10: Preventing or detecting unlawful acts
- DPA 2018 Schedule 1, Part 2, Para 18: Safeguarding of children and of individuals at risk

5. Can you describe the information flows?

5.1 How is information collected?

CCTV Camera Body Worn Video

ANPR Unmanned aerial systems (drones)

Stand-alone cameras Real time monitoring

Other (please specify)

5.2 Does the system's technology enable recording?

Yes No

Recording takes place on site to a cluster of local CCTV servers.

Audio recording takes place on three fixed CCTV cameras. There is clear signage advising that audio recording is taking place in the three locations where fixed CCTV cameras with audio recording capabilities are installed.

The data recorded will only be used by Cotham School or others permitted by the School for specific and legitimate purposes and only then in secure conditions. In no circumstances will the recorded data be issued, given or sold to any third party by the employees of the school without the approval of the Headteacher or the School Business Manager.

Authorised personnel will be provided with unique logins for the Schools CCTV system which will only be issued once that member of staff has signed a CCTV code of conduct. Live images will not be actively monitored. The only exception to this will be if an immediate need is identified to prevent threats to life and/or public safety by using live images to coordinate a response to a live incident in progress. The cluster of CCTV servers are stored in a secure server room access restricted to authorised personnel only.

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3. What other less privacy-intrusive solutions such as improved lighting have been considered?

A number of measures are already in place to provide safety for staff and pupils such as a secure site perimeter on the schools three sites, access controlled doors and gates, however the use of CCTV will provide support to existing practices and it will only be used where there is considered to be a higher level of risk such as an intruder trying to gain unauthorised access to the site. Where possible on the main school site we have improved external lighting as far as possible but this has not reduced the number of attempted break-ins or intruders on site. We have also had a number of incidents this academic year at our offsite playing fields (Stoke Lodge) where members of the public have harassed both staff and students through the perimeter fence. The school has also been subject to several thousand pounds worth of criminal damage to the fence and gates at its offsite playing fields at Stoke Lodge. All of these incidents have been reported to the police. The system is operational 24/7 in all locations.

4. What is the lawful basis for using the surveillance camera system?

Under Health and Safety legislation, schools are responsible for day-to-day health and safety whenever pupils are in the care of school staff - this includes school trips and clubs.

Under The Health and Safety at Work Act 1974 and The Management of Health and Safety at Work Regulations 1999, employers have a responsibility to assess and avoid or reduce risks, particularly around lone workers as potential dangers facing them can be different or more acute.

Relevant and sufficient security measures and procedures help Cotham School to comply with relevant regulations by helping to protect pupil and staff from violence, bullying and aggression as well as deterring crime.

The following lawful bases apply to the processing of personal data captured by school CCTV systems:

- GDPR Article 6 (1)(c): Compliance with a legal obligation including Management of Health and Safety at Work Regulations 1999, Health and Safety at Work Act 1974, Crime & Disorder Act 1998
- GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Cotham School i.e. keeping our pupils safe at school.
- GDPR Article 6 (1)(f): Where Cotham School is processing CCTV footage for a legitimate reason other than performing its tasks as a public authority then this processing may be necessary for the purposes of our (or someone else's) legitimate interests, except where overridden by the data subject's data protection rights and freedoms. The school and its visitors have a legitimate interest in being in a safe and secure environment while the legitimate interests of the school include protecting school buildings and property and the prevention and detection of crime and staff and visitor safety.

Where processing personal data involves special category data (as defined by the GDPR) then Cotham School will ensure that one of the special category conditions apply as per Article 9 of the GDPR and that this is recorded. This is likely to be (but not limited to):

Article 9 (2) (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to

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5.3 What type of transmission is used for the installation subject of this DPIA?

Fibre optic Wireless (please specify below)

Hard wired (apart from fibre optic, please specify) Broadband

Other (please specify)

Edge network switches at Cotham School are linked back to the server room using Fibre optic cables. All cameras are hard wired into edge switching hardware. CCTV at Stoke Lodge uses a secure VPN over the Bristol City Council WAN (Wide Area Network) to connect back to the server room at Cotham School. Some remote cameras at Stoke Lodge use an encrypted point to point wireless bridge.

5.4 What security features are there to protect transmission data?

Cotham School will ensure the security of the data processed in line with Article 5(1)(f) of The GDPR which requires that personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The CCTV installation is managed and maintained by Cotham School's Assistant Business Manager - Facilities and IT Services Lead in line with the schools IT Policies. The school operates a number of layers of security to protect its IT systems from unauthorised access. There is a firewall in place at Bristol City Council trading with schools (the schools ISP).

The VPN uses AES256 Encryption with a SHA256 Hash. The wireless network bridge uses WPA2 encryption with Mac Address filtering.

The CCTV software solution stores all recorded video in an encrypted database which can only be accessed via the client application using valid logon credentials.

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5.5 Where will the information be collected from?

Public places (please specify) Car parks

Buildings/premises (external) Buildings/premises (internal public areas) (please specify)

- All car parks owned by Cotham School
- All external entry and exit points of the schools three sites.
- Internally on stairwells and in corridors.
- Internally in IT Suites and other areas where items of high value have been stored – Where previous theft has taken place.
- Internally in open public areas of toilets to monitor sinks, handriers and cubicle doors to provide support when investigating allegations of bullying.
- In areas where staff frequently work with students who are vulnerable or have behavioural issues – such as the SEN Safe Space, Separated Learning, etc. Cameras in these locations are installed for the benefit of both staff and students alike so in the event an allegation is made, the CCTV can be reviewed.
- Stoke Lodge Playing Fields – Members of the public have permissive access to Stoke Lodge when the field is not in use by the school.

5.6 What type of transmission is used for the installation subject of this DPIA?

General public in monitored areas (general observation) Vehicles

Target individuals or activities (suspicious persons/incidents) Visitors

Other (please specify)

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5.9 How long is footage storage?

30 days.

5.10 Retention Procedure

Footage automatically deleted after retention period

System operator required to initiate deletion

Under certain circumstances authorised persons may override the retention period e.g. retained for prosecution agency.

In the event of a major incident which leads to a student exclusion or a staff disciplinary which could be subject to an appeal, the CCTV is bookmarked and protected. Similarly if there was a Police investigation, the CCTV is also bookmarked and protected. – This is a software lock which overrides the retention period. The list of retained footage is regularly reviewed and footage which can be overwritten is unprotected as appropriate.

5.11 With which external agencies/bodies is the information/footage shared?

Statutory prosecution agencies Local Government agencies

Judicial system Legal representatives

Data subjects Other (please specify)

In the event information/footage is shared with an external agency/body, it would be Cotham School's standard practice for both parties to sign a Data Sharing Agreement.

Cotham School may also share footage where it is fair and lawful to do so, for example we may use images in support of an insurance claim.

Data subjects may request CCTV of themselves through a Subject Access Request.

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5.7 What measures are in place to mitigate the risk of cyber-attacks which interrupt service or lead to the unauthorised disclosure of images and information?

The CCTV installation is managed and maintained by Cotham School's Assistant Business Manager - Facilities and IT Services Lead in line with the schools IT Policies. The school operates a number of layers of security to protect its IT systems from unauthorised access. There is a firewall in place at Bristol City Council trading with schools (the schools ISP).

The VPN uses AES256 Encryption with a SHA256 Hash. The wireless network bridge uses WPA2 encryption with Mac Address filtering.

The CCTV software solution stores all recorded video in an encrypted database which can only be accessed via the client application using valid logon credentials.

Both client and server devices are protected using Antivirus and Antimalware packages.

All CCTV traffic is on a designated VLAN away from other school equipment.

5.8 How is the information used?

Monitored in real time to detect and respond to unlawful activities

Monitored in real time to track suspicious persons/activity

Compared with reference data of persons of interest through Automatic Facial Recognition software

Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software

Used to search for vulnerable persons

Used to search for wanted persons

Recorded data disclosed to authorised agencies to support post incident investigation by, including law enforcement agencies

Recorded data disclosed to authorised agencies to provide intelligence

Other (please specify)

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5.12 How is the information disclosed to the authorised agencies?

Only by onsite visiting

Copies of the footage released to those mentioned above (please specify below how released e.g. sent by post, courier, etc)

Offsite from remote server

Other (please specify)

In instances where external agencies/bodies have need to review Cotham School's CCTV, this will happen on site and under the supervision of the Assistant Business Manager - Facilities and IT Services Lead or another member of the management team when the Assistant Business Manager - Facilities and IT Services Lead is not available.

Where footage is released by Cotham School to external agencies/bodies it is the schools standard practice to issue information/footage on an encrypted USB stick. The password for the encrypted USB stick will be given out verbally to the person collecting the stick on production of a valid photographic ID proving the individual's identity and occupation. The release of the USB stick is recorded with incident details on a shared spreadsheet.

5.13 Is there a written policy specifying the following?

Which agencies are granted access

How information is disclosed

How information is handled

Recipients of information become Data Controllers of the copy disclosed

Are these procedures made public? Yes No

Are there auditing mechanisms? Yes No

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5.14 Do operating staff receive appropriate training to include the following?

- Legislation issues
- Monitoring, handling, disclosing, storage, deletion of information
- Disciplinary procedures
- Incident procedures
- Limits on system uses
- Other (please specify)

Staff receive training in how to use the schools CCTV system by the Assistant Business Manager - Facilities and IT Services Lead.

5.15 Do CCTV operators receive ongoing training?

- Yes No

Once a year, or sooner if requested.

5.16 Are there appropriate signs which inform the public when they are in an area covered by surveillance camera systems?

- Yes No

6. What are the views of those who will be under surveillance?

The school CCTV system is used to provide an additional layer of assurance regarding the safety of pupils, staff and visitors through deterring potential incidents. The school has ensured that staff, pupils and visitors are aware of the CCTV system through ensuring that there is clear signage on every entry point.

7. What are the benefits to be gained from using surveillance cameras?

The benefits of the CCTV system to our school include protection of school property - the presence of CCTV will deter criminals from theft of expensive support equipment from the school. CCTV provides an enhanced feeling of safety and security for pupils, staff and visitors to the school. Its use will also support

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retrospective investigation of incidents and may also provide evidence for use in prosecutions where necessary.

For live footage the main benefit is the additional layer of support provided by other members of staff who will have access to live footage in order to raise the alarm in certain situations.

8. What are the privacy risks arising from this surveillance camera system?

Privacy is maintained by directing the CCTV camera away from private property and limiting the number of authorised people who can access the system. Images are automatically deleted after 30 days unless the data has been explicitly protected. The images are only shared with those listed in section 5.11. The impact on individuals is considered to be positive as it leads to a safer environment.

9. Have any data protection by design and default features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements?

The CCTV camera locations and areas it covers have been selected with privacy in mind. Whilst privacy masking features can be useful, we avoid overlooking an area in the first place if it is likely to concern neighbours of the school. All camera locations will be clearly visible and signage will give a clear warning that CCTV is in use as per our CCTV Policy. Cameras will be sited and configured not to overlook private dwellings or other areas where privacy is expected.

10. What organisations will be using the surveillance camera images, and where is the controller responsibility under the GDPR and Data Protection Act 2018?

The images will be used by the school and may be shared with the Police where necessary and lawful for the investigation of crime and antisocial behaviour and evidential purposes.

The Data Controller is Cotham School who will retain ultimate control of the information and decisions around how it can be used. This includes how long the data is retained and how it is disposed of. If for any genuine law enforcement purpose it becomes necessary to pass footage to the Police then they will assume responsibility (be Data Controller) and data will be processed in line with the Law Enforcement Provisions of the DPA 2018 under Part 3 Section 31.

11. Do the images need to be able to recognise or identify individuals, or could the purpose be met using images in which individuals cannot be identified?

The images need to recognise individuals so that they can be recognised by a relevant responsible member of staff or identified to provide evidence for the investigation of crime and antisocial behaviour, including helping eliminate suspects from Police enquiries where necessary and lawful to do so.

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12. How will you inform people that they are under surveillance and respond to any Subject Access Requests, the exercise of any other rights of data subjects, complaints or requests for information?

Signage is in place in the vicinity of CCTV cameras, explaining that the area they are entering is covered by CCTV.

Policies and procedures are in place for responding to Subject Access Requests and other requests for information. The Privacy Notice is available on the School's website.

13. How will you know if the particular camera system/hardware/software/firmware being considered does deliver the desired benefits now and in the future?

The system is reviewed annually by a report to the School's Governors. The School's risk management processes deal with safety and security and regular meetings are held with the Assistant Business Manager - Facilities and IT Services Lead. The Data Protection Act (DPA) and General Data Protection Regulation (GDPR) requirements are discussed at bi-termly meetings. One of these meetings per academic year is attended by the schools Data Protection Officer (DPO).

14. What future demands may arise for wider use of images and how will these be addressed?

There are no plans to extend the scope of the current CCTV system. A new Data Protection Impact Assessment would be carried out prior to commissioning any changes.

15. Have you considered the extent to which your surveillance camera system may interfere with the rights and freedoms conferred under the European Convention on Human Rights?

The CCTV system has been set up on a proper and legal basis and is compliant with the Data Protection Act 2018, Human Rights Act and other legal requirements. The system is reviewed at least annually to justify the need.

16. Do any of these measures discriminate against any particular sections of the community?

The CCTV system, policies, processes and locations selected do not discriminate against individuals or groups. The system is reviewed annually by a report to the School's Governors. An Equality Impact Assessment has been carried out as a way of facilitating and evidencing compliance with the Public Sector Equality Duty and the Equality Act 2010.



Data Protection Impact Assessment (DPIA) for CCTV

Version	Date	Summary of Changes
1.0	04/05/2021	Initial version

Approved by Governors: 02/12/2019
Review Date: Ongoing annual review

Monitoring and review

- This policy will be reviewed annually.
- Any incidents occurring during the school year will be evaluated and where necessary appropriate action will be taken to amend the policy accordingly.

Level One Assessment

Location of surveillance camera system being assessed:

This data protection impact assessment applies to the xxxx CCTV cameras and two body worn cameras used at Cotham Schools three sites;

- **Cotham School**, Cotham Lawn Road, Cotham, Bristol, BS6 6DT
- **North Bristol Post 16 Centre**, Charmwood House, 30 Cotham Park, Bristol, BS6 6BU
- **Stoke Lodge Playing Fields**, West Dene, Bristol, BS9 2BH

Date of assessment	04/05/2021
Review date	03/05/2022
Name of person responsible	The Assistant Business Manager - Facilities and IT Services Lead, Cotham School, Cotham Lawn Road, Cotham, Bristol, BS6 6DT
Name of Data Protection Officer	One West, Lewis House, Manvers Street, Bath, BA1 1JG

GDPR and Data Protection Act 2018 and Surveillance Camera Code of Practice

1. What are the problems that you need to address in defining your purpose for using the surveillance camera system?

CCTV will be used to provide safety assurance to staff and pupils at the school. Monitoring may allow staff to identify and deter incidents where staff may not be present. Footage will also assist in any post incident evaluation. Where necessary cameras may be used for the prevention and detection of crime and anti-social behaviour and for the protection of school property. For example through deterring vandalism, bullying and discouraging anti-social behaviour including alcohol and drug related issues. Footage may also be used or shared with law enforcement bodies where necessary for the apprehension and prosecution of offenders. There have been a number of break-ins on the Main School Campus, particularly in areas where IT equipment is used. In addition to this there have been a number of issues with antisocial behaviour and vandalism at our offsite playing fields, Stoke Lodge.

2. Can surveillance camera technology realistically mitigate the risks attached to those issues?

CCTV helps protect school property and provides an additional layer of assurance regarding the safety of pupils, staff and visitors through deterring potential incidents. It may support the police in a bid to deter and detect crime and in identifying, apprehending and prosecuting offenders.

3. What other less privacy-intrusive solutions such as improved lighting have been considered?

A number of measures are already in place to provide safety for staff and pupils such as a secure site perimeter on the schools three sites, access controlled doors and gates, however the use of CCTV will provide support to existing practices and it will only be used where there is considered to be a higher level of risk such as an intruder trying to gain unauthorised access to the site. Where possible on the main school site we have improved external lighting as far as possible but this has not reduced the number of attempted break-ins or intruders on site. We have also had a number of incidents this academic year at our offsite playing fields (Stoke Lodge) where members of the public have harassed both staff and students through the perimeter fence. All of these incidents have been reported to the police. The system is operational 24/7 in all locations.

4. What is the lawful basis for using the surveillance camera system?

Under Health and Safety legislation, schools are responsible for day-to-day health and safety whenever pupils are in the care of school staff - this includes school trips and clubs.

Under The Health and Safety at Work Act 1974 and The Management of Health and Safety at Work Regulations 1999, employers have a responsibility to assess and avoid or reduce risks, particularly around lone workers as potential dangers facing them can be different or more acute.

Relevant and sufficient security measures and procedures help Cotham School to comply with relevant regulations by helping to protect pupil and staff from violence, bullying and aggression as well as deterring crime.

The following lawful bases apply to the processing of personal data captured by school CCTV systems:

- GDPR Article 6 (1)(c): Compliance with a legal obligation including Management of Health and Safety at Work Regulations 1999, Health and Safety at Work Act 1974, Crime & Disorder Act 1998
- GDPR Article 6(1)(e): Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in Cotham School i.e. keeping our pupils safe at school.
- GDPR Article 6 (1)(f): Where Cotham School is processing CCTV footage for a legitimate reason other than performing its tasks as a public authority then this processing may be necessary for the purposes of our (or someone else's) legitimate interests, except where overridden by the data subject's data protection rights and freedoms. The school and its visitors have a legitimate interest in being in a safe and secure environment while the legitimate interests of the school include protecting school buildings and property and the prevention and detection of crime and staff and visitor safety.

Where processing personal data involves special category data (as defined by the GDPR) then Cotham School will ensure that one of the special category conditions apply as per Article 9 of the GDPR and that this is recorded. This is likely to be (but not limited to):

Article 9 (2) (g) processing is necessary for reasons of substantial public interest, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject.

In line with the Data Protection Act 2018 Schedule 1 Part 2, one or more specific 'substantial public interest' conditions for Article 9(2)(g) will apply. This may be, but is not limited to:

- DPA 2018 Schedule 1, Part 2, Para 6: Statutory etc and government purposes
- DPA 2018 Schedule 1, Part 2, Para 10: Preventing or detecting unlawful acts
- DPA 2018 Schedule 1, Part 2, Para 18: Safeguarding of children and of individuals at risk

5. Can you describe the information flows?

5.1 How is information collected?

- | | |
|---|---|
| <input checked="" type="checkbox"/> CCTV Camera | <input checked="" type="checkbox"/> Body Worn Video |
| <input type="checkbox"/> ANPR | <input type="checkbox"/> Unmanned aerial systems (drones) |
| <input type="checkbox"/> Stand-alone cameras | <input type="checkbox"/> Real time monitoring |
| <input type="checkbox"/> Other (please specify) | |

5.2 Does the system's technology enable recording?

- Yes No

Recording takes place on site to a cluster of local CCTV servers.

Audio recording takes place on all body worn video cameras and three fixed CCTV cameras.

There is clear signage advising that audio recording is taking place in the three locations where fixed CCTV cameras with audio recording capabilities are installed.

The data recorded will only be used by Cotham School or others permitted by the School for specific and legitimate purposes and only then in secure conditions. In no circumstances will the recorded data be issued, given or sold to any third party by the employees of the school without the approval of the Headteacher or the School Business Manager.

Authorised personnel will be provided with unique logins for the Schools CCTV system which will only be issued once that member of staff has signed a CCTV code of conduct. Live images will not be actively monitored. The only exception to this will be if an immediate need is identified to prevent threats to life and/or public safety by using live images to coordinate a response to a live incident in progress. The cluster of CCTV servers are stored in a secure server room access restricted to authorised personnel only.

5.3 What type of transmission is used for the installation subject of this DPIA?

- | | |
|---|---|
| <input checked="" type="checkbox"/> Fibre optic | <input checked="" type="checkbox"/> Wireless (please specify below) |
| <input checked="" type="checkbox"/> Hard wired (apart from fibre optic, please specify) | <input type="checkbox"/> Broadband |
| <input checked="" type="checkbox"/> Other (please specify) | |

Edge network switches at Cotham School are linked back to the server room using Fibre optic cables. All cameras are hard wired into edge switching hardware. CCTV at Stoke Lodge uses a secure VPN over the Bristol City Council WAN (Wide Area Network) to connect back to the server room at Cotham School. Some remote cameras at Stoke Lodge use an encrypted point to point wireless bridge.

5.4 What security features are there to protect transmission data?

Cotham School will ensure the security of the data processed in line with Article 5(1)(f) of The GDPR which requires that personal data is processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

The CCTV installation is managed and maintained by Cotham School's IT Services Manager in line with the schools IT Policies. The school operates a number of layers of security to protect its IT systems from unauthorised access. There is a firewall in place at Bristol City Council trading with schools (the schools ISP).

The VPN uses AES256 Encryption with a SHA256 Hash. The wireless network bridge uses WPA2 encryption with Mac Address filtering.

The CCTV software solution stores all recorded video in an encrypted database which can only be accessed via the client application using valid logon credentials.

5.5 Where will the information be collected from?

Public places (please specify) Car parks

Buildings/premises (external) Buildings/premises (internal public areas)
(please specify)

- All car parks owned by Cotham School
- All external entry and exit points of the schools three sites.
- Internally on stairwells and in corridors.
- Internally in IT Suites and other areas where items of high value have been stored – Where previous theft has taken place.
- Internally in open public areas of toilets to monitor sinks, handriers and cubicle doors to provide support when investigating allegations of bullying.
- In areas where staff frequently work with students who are vulnerable or have behavioural issues – such as the SEN Safe Space, Separated Learning, etc. Cameras in these locations are installed for the benefit of both staff and students alike so in the event an allegation is made, the CCTV can be reviewed.
- Stoke Lodge Playing Fields – Members of the public have permissive access to Stoke Lodge when the field is not in use by the school.

5.6 What type of transmission is used for the installation subject of this DPIA?

General public in monitored areas Vehicles
(general observation)

Target individuals or activities (suspicious persons/incidents) Visitors

Other (please specify)

5.9 How long is footage storage?
30 days.

5.10 Retention Procedure

Footage automatically deleted after retention period

System operator required to initiate deletion

Under certain circumstances authorised persons may override the retention period
e.g. retained for prosecution agency.

In the event of a major incident which leads to a student exclusion or a staff disciplinary which could be subject to an appeal, the CCTV is bookmarked and protected. Similarly if there was a Police investigation, the CCTV is also bookmarked and protected. – This is a software lock which overrides the retention period. The list of retained footage is regularly reviewed and footage which can be overwritten is unprotected as appropriate.

5.11 With which external agencies/bodies is the information/footage shared?

Statutory prosecution agencies Local Government agencies

Judicial system Legal representatives

Data subjects Other (please specify)

In the event information/footage is shared with an external agency/body, it would be Cotham School's standard practice for both parties to sign a Data Sharing Agreement.

Cotham School may also share footage where it is fair and lawful to do so, for example we may use images in support of an insurance claim.

Data subjects may request CCTV of themselves through a Subject Access Request.

5.7 What measures are in place to mitigate the risk of cyber-attacks which interrupt service or lead to the unauthorised disclosure of images and information?

The CCTV installation is managed and maintained by Cotham School's IT Services Manager in line with the schools IT Policies. The school operates a number of layers of security to protect its IT systems from unauthorised access. There is a firewall in place at Bristol City Council trading with schools (the schools ISP).

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Both client and server devices are protected using Antivirus and Antimalware packages.

All CCTV traffic is on a designated VLAN away from other school equipment.

5.8 How is the information used?

Monitored in real time to detect and respond to unlawful activities

Monitored in real time to track suspicious persons/activity

Compared with reference data of persons of interest through Automatic Facial Recognition software

Compared with reference data for vehicles of interest through Automatic Number Plate Recognition software

Used to search for vulnerable persons

Used to search for wanted persons

Recorded data disclosed to authorised agencies to support post incident investigation by, including law enforcement agencies

Recorded data disclosed to authorised agencies to provide intelligence

Other (please specify)

5.12 How is the information disclosed to the authorised agencies?

Only by onsite visiting

Copies of the footage released to those mentioned above
(please specify below how released e.g. sent by post, courier, etc)

Offsite from remote server

Other (please specify)

In instances where external agencies/bodies have need to review Cotham School's CCTV, this will happen on site and under the supervision of the IT Services Manager or another member of the management team when the IT Services Manager is not available.

Where footage is released by Cotham School to external agencies/bodies it is the schools standard practice to issue information/footage on an encrypted USB stick. The password for the encrypted USB stick will be given out verbally to the person collecting the stick on production of a valid photographic ID proving the individual's identity and occupation. The release of the USB stick is recorded with incident details on a shared spreadsheet.

5.13 Is there a written policy specifying the following?

Which agencies are granted access

How information is disclosed

How information is handled

Recipients of information become Data Controllers of the copy disclosed

Are these procedures made public? Yes No

Are there auditing mechanisms? Yes No

5.14 Do operating staff receive appropriate training to include the following?

- Legislation issues
- Monitoring, handling, disclosing, storage, deletion of information
- Disciplinary procedures
- Incident procedures
- Limits on system uses
- Other (please specify)

Staff receive training in how to use the schools CCTV system by the IT Services Manager.

5.15 Do CCTV operators receive ongoing training?

- Yes No

Once a year, or sooner if requested.

5.16 Are there appropriate signs which inform the public when they are in an area covered by surveillance camera systems?

- Yes No

6. What are the views of those who will be under surveillance?

The school CCTV system is used to provide an additional layer of assurance regarding the safety of pupils, staff and visitors through deterring potential incidents. The school has ensured that staff, pupils and visitors are aware of the CCTV system through ensuring that there is clear signage on every entry point.

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The benefits of the CCTV system to our school include protection of school property - the presence of CCTV will deter criminals from theft of expensive support equipment from the school. CCTV provides an enhanced feeling of safety and security for pupils, staff and visitors to the school. Its use will also support retrospective investigation of incidents and may also provide evidence for use in prosecutions where necessary.

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Policies and procedures are in place for responding to Subject Access Requests and other requests for information. The Privacy Notice is available on the School's website.

13. How will you know if the particular camera system/hardware/software/firmware being considered does deliver the desired benefits now and in the future?

The system is reviewed annually by a report to the School's Governors. The School's risk management processes deal with safety and security and regular meetings are held with the IT Services Manager. The Data Protection Act (DPA) and General Data Protection Regulation (GDPR) requirements are discussed at bi-termly meetings. One of these meetings per academic year is attended by the schools Data Protection Officer (DPO).

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There are no plans to extend the scope of the current CCTV system. A new Data Protection Impact Assessment would be carried out prior to commissioning any changes.

15. Have you considered the extent to which your surveillance camera system may interfere with the rights and freedoms conferred under the European Convention on Human Rights?

The CCTV system has been set up on a proper and legal basis and is compliant with the Data Protection Act 2018, Human Rights Act and other legal requirements. The system is reviewed at least annually to justify the need.

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The CCTV system, policies, processes and locations selected do not discriminate against individuals or groups. The system is reviewed annually by a report to the School's Governors. An Equality Impact Assessment has been carried out as a way of facilitating and evidencing compliance with the Public Sector Equality Duty and the Equality Act 2010.

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For live footage the main benefit is the additional layer of support provided by other members of staff who will have access to live footage in order to raise the alarm in certain situations.

8. What are the privacy risks arising from this surveillance camera system?

Privacy is maintained by directing the CCTV camera away from private property and limiting the number of authorised people who can access the system. Images are automatically deleted after 30 days unless the data has been explicitly protected. The system is not used to covertly monitor staff or visitors. The images are only shared with those listed in section 5.11. The impact on individuals is considered to be positive as it leads to a safer environment.

9. Have any data protection by design and default features been adopted to reduce privacy intrusion? Could any features be introduced as enhancements?

The CCTV camera locations and areas it covers have been selected with privacy in mind. Whilst privacy masking features can be useful, we avoid overlooking an area in the first place if it is likely to concern neighbours of the school. All camera locations will be clearly visible and signage will give a clear warning that CCTV is in use as per our CCTV Policy. The school will not use covert cameras and cameras will be sited and configured not to overlook private dwellings or other areas where privacy is expected.

10. What organisations will be using the surveillance camera images, and where is the controller responsibility under the GDPR and Data Protection Act 2018?

The images will be used by the school and may be shared with the Police where necessary and lawful for the investigation of crime and antisocial behaviour and evidential purposes.

The Data Controller is Cotham School who will retain ultimate control of the information and decisions around how it can be used. This includes how long the data is retained and how it is disposed of. If for any genuine law enforcement purpose it becomes necessary to pass footage to the Police then they will assume responsibility (be Data Controller) and data will be processed in line with the Law Enforcement Provisions of the DPA 2018 under Part 3 Section 31.

11. Do the images need to be able to recognise or identify individuals, or could the purpose be met using images in which individuals cannot be identified?

The images need to recognise individuals so that they can be recognised by a relevant responsible member of staff or identified to provide evidence for the investigation of crime and antisocial behaviour, including helping eliminate suspects from Police enquiries where necessary and lawful to do so.

12. How will you inform people that they are under surveillance and respond to any Subject Access Requests, the exercise of any other rights of data subjects, complaints or requests for information?

Signage is in place in the vicinity of CCTV cameras, explaining that the area they are entering is covered by CCTV.

Cotham School Data Protection Impact Assessment (DPIA) for CCTV

12

Monitoring and review

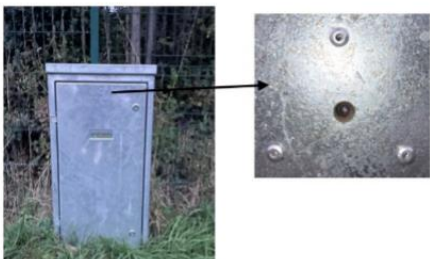
- This policy will be reviewed every three years.
- Any incidents occurring during the school year will be evaluated and where necessary appropriate action will be taken to amend the policy accordingly.

Cotham School Data Protection Impact Assessment (DPIA) for CCTV

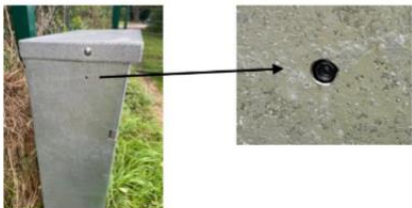
14

Appendix 1: A photograph of the street cabinet on our playing fields which houses the discreetly placed overt CCTV cameras.

Front view of the junction box with close up detail:
Camera lens is visible inside the hole drilled near the top of the cabinet door.

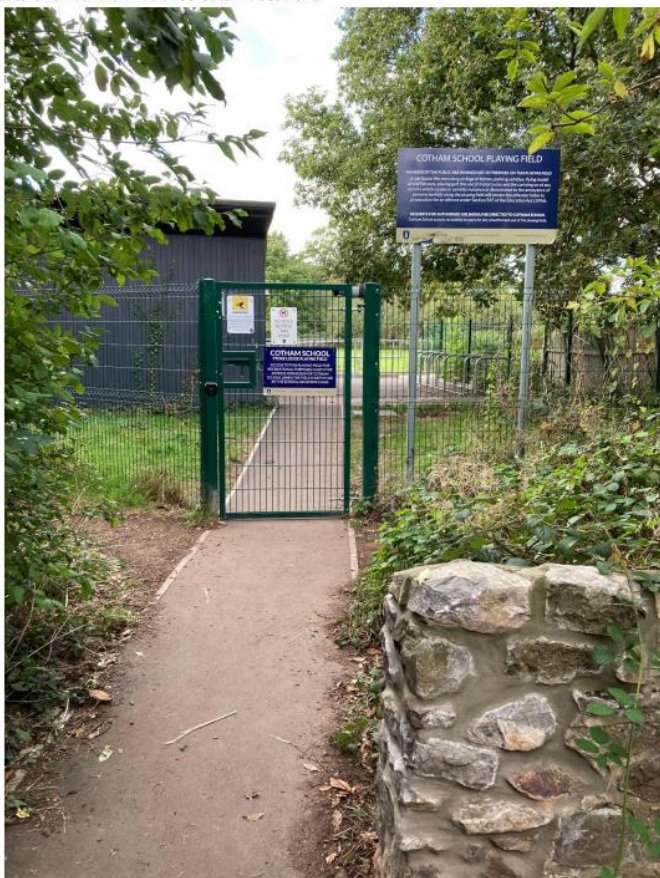


Side view of the junction box with close up detail:
Camera lens is visible inside the hole drilled in the side of the metal cabinet.



Appendix 2: Photographs of the five gates to the playing fields. All of these have the same signage on, depicting the permissive public access to the playing fields when they are not in use by the school and the CCTV warning signs that are in place which indicate that CCTV is in operation and recording takes place 24 hours a day, every day.

Gate One - Pavilion Entrance Gate - West Dene



Gate Two - Mower Shed Gate - Parrys Lane



Gate Three - Arboretum Gate





Gate Four - Adult Education Centre Gate (Location of the two cameras in despite).



Gate Five - Cheyne Road Gate




RE: Letter to [REDACTED]

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Mon 24/10/2022 17:15

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Hi,
Apologies for the delay in responding to you.
We've checked, but can't locate a record of having received the complaint directly from the MP. I'll follow up further with colleagues.
Thanks,








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