



# Data Protection Impact Assessment (DPIA)

## Wildlife Camera System

Member of staff responsible	John Read
Governor responsible	Daniel Alexander
Date approved at Governing Body	
Frequency of policy review	Three years
Date next review due	

### Document Version Control

Version	Issue Date	Summary of changes
V1		New Document

## DPIA Approval and Governance Record (for Governors)

**Project:** Installation of a non-audio wildlife camera to cover an area of repeated vandalism

**School:** Lyneham Primary School

**ICO Registration Number:** ZA360233

**Purpose of DPIA:** To assess and evidence compliance with UK GDPR, the Data Protection Act 2018, and the Surveillance Camera Code of Practice before the installation and operation of a CCTV system.

### Summary of Decision:

Governors have reviewed this DPIA and are satisfied that:

- The purpose of CCTV use is clearly defined and legitimate
- The processing is necessary and proportionate
- Risks to individuals' rights and freedoms have been identified and appropriately mitigated
- Adequate technical and organisational measures are in place

### Decision:

Approved to proceed as described

Approved subject to conditions (specify): \_\_\_\_\_

Not approved (reasons): \_\_\_\_\_

**Named Responsible Person (Senior Leader):** \_\_\_\_\_

**Data Protection Officer consulted: Yes**

**Date of approval:** \_\_\_\_\_

**Date for review:** \_\_\_\_\_

# Data Protection Impact Assessment (DPIA)

## CCTV

### 1 Description of the Processing

- 1.1 The data controller for this processing is Lyneham Primary School (The school). The school proposes to install a temporary wildlife camera system comprising one fixed-position camera. The system will be video-only and will record footage to an internal memory card with the camera located securely on the school premises.
- 1.2 The system will not be connected to the cloud, will not permit remote access off-site, and will operate independently within the school's internal network environment. Recorded footage will be stored locally for a limited retention period and overwritten automatically unless required for investigation purposes.
- 1.3 The camera will be positioned to monitor a vulnerable area of the school site that has been subject to criminal damage. Camera angles will be carefully set to capture images within the school boundary, with a minimal and unavoidable overlap of up to a maximum of 2 metres onto the adjacent private road and green space.
- 1.4 The CCTV system is proposed to operate **outside of school hours only**, when pupils are not present on site, to reduce intrusion into the privacy of individuals.

### 2 Purpose of the Surveillance

- 2.1 The primary purpose of installing the CCTV system is to:
  - Prevent and deter criminal damage and vandalism to school buildings and property
  - Assist in the detection and investigation of criminal incidents
  - Protect school assets and reduce repair and insurance costs
  - Provide reassurance to the school community in response to increasing local crime
- 2.2 The school has seen an increase in deliberate damage to the fences over the past month. Golfballs have been found on the school premises, indicating an increased and credible risk to the safety and integrity of the school property.
- 2.3 The surveillance is not intended to monitor staff, pupils, or members of the public, nor to be used for performance management or behavioural monitoring.

### 3 Lawful Basis for Processing

- 3.1 The lawful basis relied upon for the processing of personal data through CCTV is:
  - **Article 6(1)(e) UK GDPR – Public task:** the processing is necessary for the performance of a task carried out in the public interest, namely ensuring the safety and security of school premises and property.

- 3.2 The processing is supported by the school's statutory duties to safeguard property, manage public funds responsibly, and provide a safe environment.
- 3.3 Special category data is not intentionally collected. Any incidental capture of such data will be limited, unavoidable, and subject to appropriate safeguards.

#### **4 Necessity and Proportionality**

- 4.1 In line with the Surveillance Camera Code of Practice, the school has considered whether the purpose could reasonably be achieved by less intrusive means.
- The school has seen an increase in criminal damage, including the deliberate damage to the school perimeter fence.
  - Incidents occur outside school hours, when staff are not present
  - Other measures (lighting, fencing, routine site checks) are already in place, but have not sufficiently reduced risk
- 4.2 The proposed CCTV system is a targeted, time-limited, and proportionate response:
- Cameras operate **only outside of school hours**
  - No audio recording
  - No cloud storage or remote access
  - Minimal and unavoidable overspill (approximately 2 metres) onto the adjacent private road and green space
  - Cameras are fixed and not actively monitored in real time
- 4.3 The level of intrusion is considered low and justified by the legitimate aim of crime prevention and property protection.

#### **5 Stakeholders and Consultation**

- 5.1 The following stakeholders have been considered:
- School leadership and governing body
  - Site management staff
  - Parents/carers (via privacy notice and signage)
  - Members of the public using the adjacent road (via signage)
- 5.2 Given the targeted and limited nature of the surveillance, formal public consultation has not been undertaken. However, transparency will be ensured through updated privacy information and visible signage.

#### **6 Data Protection Officer (DPO) Consultation**

- 6.1 In accordance with Article 35(2) UK GDPR, the school's Data Protection Officer (DPO) has been consulted during the completion of this DPIA.
- 6.2 The DPO has reviewed:
- the stated purpose and lawful basis for processing;
  - proposed camera locations, coverage, and unavoidable overspill;
  - operating hours and retention period;
  - technical and organisational security measures; and
  - identified risks and mitigation measures.

6.3 The DPO has confirmed that the proposed processing is necessary and proportionate, that appropriate safeguards are in place, and that residual risks to individuals' rights and freedoms are low.

6.4 The DPO has advised that consultation with the ICO under Article 36 UK GDPR is not required.

## 7 Risks to Individuals' Rights and Freedoms

7.1 The following risks have been identified and assessed in accordance with ICO guidance:

Risk	Likelihood	Impact	Overall Risk
Capture of members of the public on the adjacent road	Low	Medium	Low-Medium
Perception of excessive surveillance	Low	Low	Low
Unauthorised access to footage	Low	High	Medium
Retention beyond necessity	Low	Medium	Low

## 8 Measures to Mitigate Risks

8.1 To reduce risks to an acceptable level, the following controls will be implemented:

- Camera positioning approved by senior leadership before activation
- Overspill beyond the school boundary is kept to the absolute minimum necessary
- Privacy masking applied where technically possible
- System configured for out-of-hours operation only
- Access restricted to named, trained staff
- Strong authentication controls applied
- Clear written procedures for viewing, exporting, and sharing footage
- Retention strictly limited and automatically enforced
- CCTV use included in staff training and induction where relevant

8.2 These measures reduce residual risk to a **low level**.

## 9 Data Retention

9.1 Recorded footage will be retained for a maximum of **30 days** and will then be automatically overwritten, unless:

- An incident has been identified
- Footage is required for investigation by the school, police, or insurers

9.2 Where footage is extracted, it will be securely stored, access-controlled, and retained only for as long as necessary.

## 10 Data Security

10.1 Appropriate technical and organisational measures will be in place, including:

- Secure, locked location for the CCTV hub
- Password-protected access
- Restricted user permissions
- No cloud connectivity or remote access
- Procedures for secure export and transfer of footage where required

## 11 Transparency and Individual Rights

11.1 The school will ensure transparency by:

- Displaying clear CCTV signage at site entrances
- Updating its privacy notice to include CCTV processing

- Providing information on how individuals can exercise their data protection rights, including the right of access

11.2 Requests for access to CCTV footage will be handled in line with UK GDPR and Data Protection Act 2018 requirements.

## **12 Compliance with the Surveillance Camera Code of Practice**

12.1 The proposed CCTV system aligns with the principles of the Surveillance Camera Code of Practice by:

- Having a clearly defined and legitimate purpose
- Being necessary and proportionate
- Being transparent and accountable
- Having effective governance, policies, and procedures in place
- Ensuring images are secure and only accessed when necessary

## **13 Outcome of the DPIA**

13.1 This DPIA demonstrates that the proposed CCTV system:

- Has a clearly defined and legitimate purpose
- Is necessary and proportionate
- Includes appropriate safeguards
- Complies with UK GDPR, the Data Protection Act 2018, and the Surveillance Camera Code of Practice

13.2 Residual risk to individuals' rights and freedoms is assessed as **low**. Consultation with the ICO is not required.

## **14 Approval and Review**

14.1 This DPIA will be reviewed:

- Prior to installation
- Following installation
- If there is a change in the system, purpose, or operating hours
- At least every two years

## **15 Approved by:**

Role: \_\_\_\_\_

Date: \_\_\_\_\_