

### Personal Data Privacy Impact Assessment on Surveillance Camera Systems

#### Introduction

A Data Protection Impact Assessments may be used to identify and mitigate against any data protection related risks arising from a new project, which may affect your organisation or the individuals it engages with. A Data Protection Impact Assessment (DPIA) describes a process designed to identify risks arising out of the processing of personal data and to minimise these risks as far and as early as possible.

A Personal Data Privacy Impact Assessment (PDPIA) is required before a CCTV system is installed or if a system has previously been installed, in respect of the existing CCTV system, or when a new camera is being added on to an existing system, or when considering introducing new technology to be connected to an existing system, in order to ensure proper management of all privacy issues that may arise.

A PDPIA does not always have to be conducted as a separate exercise, it can be incorporated into project planning or other management and review activities.

#### **A privacy impact assessment should be undertaken when any of the following apply:**

- a) When you are introducing a new surveillance camera system.
- b) If you are considering introducing new or additional technology that may affect privacy (e.g. automatic number plate recognition (ANPR), body worn cameras, unmanned aerial vehicles (drones), megapixel or multi sensor very high-resolution cameras).
- c) When you are changing the location or field of view of a camera or other such change that may raise privacy concerns.
- d) When you are reviewing your system to ensure that it is still justified. (It is recommended that you review your system annually).
- e) If you are considering the capture of an additional identifier such as vehicle registration mark to enable ANPR.
- f) If the activity or change heightens privacy concerns such as voice recording and or biometric recognition such as facial and gait recognition.
- g) If your system involves any form of cross referencing to other collections of personal information.
- h) If your system involves more than one company or agency undertaking activities either on your behalf or their own behalf.
- i) When you change the way in which the recorded images and information is handled, used or disclosed.
- j) When you increase the area captured by your surveillance camera system.

- k) When you change or add an end user or recipient for the recorded information or information derived from it.

### **Description of proposed surveillance camera system**

The recording of personal data by St. Joseph's Secondary School through its CCTV system complies with the principals of the General Data Protection Regulations (GDPR) in that the 'lawful purpose' for such processing is one of 'Legitimate interests'. The requirement for fairness and transparency are adhered to through the notifications of the CCTV system to data subjects via CCTV signage at the entrances to St. Joseph's Secondary School and at various other locations throughout the premises, its curtilage as well as in the privacy notice and CCTV Policy on the website.

The personal data collected through the CCTV system is collected for the specific, explicit and legitimate purposes as stated hereunder and it is not processed in any manner that is incompatible with those purposes.

The processing of personal data through the CCTV system is adequate, relevant and limited to what is necessary for the purposes of such processing of personal data. The personal data recorded by its nature is accurate and up to date.

The personal data is kept in a form that permits identification of data subjects, for the purposes for which it is processed and is stored for no longer than is necessary. It is processed in a manner that ensures appropriate security against unauthorised or unlawful processing, accidental loss, destruction or damage while using appropriate technical or organisation measures including access controls, password requirement, and automated deletion within 30 days unless its retention is otherwise required.

The use of CCTV monitoring of public areas is conducted in a manner consistent with Equality & Diversity, Dignity at Work, Harassment and Sexual Harassment legislation, while creating mindfulness and confidence amongst staff, students, parents, guardians, visitors and the general public; as well as protecting staff, students, property, equipment, the prevention and detection of crime or public disorder incidents as well as addressing the provisions of Safety, Health and Welfare of all concerned.

### **St. Joseph's Secondary School's Privacy Impact Assessment**

The privacy impact assessment comprises two parts.

1. Level one considers the general details of the surveillance camera system and supporting business processes,

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

Page | 3

2. Level two considers the specific implications for the installation and use of cameras.

### Level One Location of surveillance camera system being assessed

| Reader Information    | Title: Personal Data Privacy Impact Assessment - CCTV System   |
|-----------------------|--|
| Purpose:              | To outline the St. Joseph's Secondary School's management personal data privacy impact assessment on its CCTV system.                        |
| Author:               | John O' Donovan, Principal   |
| Publication date:     | 13 <sup>th</sup> August 2019 reviewed Dec 2023   |
| Target Audience:      | All staff, service providers, students, parents, guardians and third parties that have access to the St. Joseph's Secondary School premises. |
| Superseded Documents: | All other Personal Data Privacy Impact Assessment on the CCTV system.  |
| Review Date:          | August 2024  |
| Contact Details:      | St. Joseph's Secondary School at Doon Road, Ballybunion, Co. Kerry - E-mail <a href="mailto:principal@sjsb.eu">principal@sjsb.eu</a>         |

### General Data Protection Regulations

1. What is the organisation's purpose for using the surveillance camera system and what are the issues that the system aims to address?

The CCTV system was installed (internally and externally) by **St. Joseph's Secondary School** for the purpose of

- enhancing security and protecting **St. Joseph's Secondary School's** buildings and assets, during and after working hours.
- promoting the health and safety of staff, students, parents, guardians, contractors, and visitors.
- monitoring and recording of restricted access areas, especially at entrances to buildings and other relevant areas.
- deterring and detecting crime or anti-social behaviour.
- assisting in investigating security or health and safety incidents / issues.
- ensuring that **St. Joseph's Secondary School** code of behaviour is respected so that the school is properly managed.
- In exceptional circumstances and where it is considered appropriate, CCTV material or images may be used to visually monitor visitors or staff members. Such exceptional circumstances could include, for example, where an accident or

incident has taken place or in the case of a staff member(s) where there is an allegation has been made.

## 2. Can a surveillance camera technology realistically deliver these benefits?

CCTV cameras placed in plain sight has been shown to

- reduce criminal activity,
- prevent vandalism,
- protect property,
- eliminate unauthorised intruders,
- monitor busy areas,
- prevent bullying,
- deter sex offenders,
- monitor visitors,
- aid in emergency evacuations
- provide peace of mind and improve the quality of life of the school community through the integration of best practices governing the private surveillance of the premises and its curtilage,
- ensuring a secure environment for the provision of education to students as required by the enactment of school legislation by the Department of Education and Skills.

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

Consultation took place with the Board of Management, teachers, staff, parents and students in relation to the installation of the CCTV system with the purposes and benefits as outlined being forefront in the decision taken to install the CCTV system. Privacy issues were addressed, and agreement was achieved for the installation of the CCTV system within the St. Joseph's Secondary School environment.

## 4. Have other less privacy-intrusive solutions such as improved lighting been considered?

As St. Joseph's Secondary School mainly operates during daylight hours, other less intrusive solutions such as, improved lighting, static security personnel, security mobile patrols were considered, and the CCTV surveillance and security applications made it a preferred choice as they

- acted as a deterrent to potential criminals in having their movements and actions recorded.
- provided a visual record of events which can be used in subsequent enquiries, investigations, or legal actions as applicable.

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

Page | 5

- provided 24/7 round-the-clock monitoring of **St. Joseph's Secondary School** premises.
- provided remote monitoring capabilities enabling viewing of live footage or recorded videos.
- cost-effective as opposed to employing a team of security personnel to monitor **St. Joseph's Secondary School's** premises.
- scalability of the CCTV system allows additional cover to be installed if required.
- their integration suitability with other security systems such as access controls and alarms were an advantage.
- ability to record evidence in relation to incidents to assist with enquiries, investigations or insurance claims etc.
- the ability to monitor large number of locations where high volume of movement occurs, and open access to the grounds of **St. Joseph's Secondary School**,
- the ability to monitor storage areas for personal property, corridors and blind spots all of which require monitoring during the day and evening.

It was decided that the provision of CCTV system operating 24/7 was required to ensure the best security of the premises, equipment, as well as any staff or students that may be present during or after school hours.

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

The benefits of CCTV cameras placed in plain sight reduces criminal activity, prevents vandalism, protects property, aids in the detection of unauthorised intruders, monitors busy areas, prevents bullying, deters sex offenders, monitors visitors, aid in emergency evacuations and provide peace of mind that improves the quality of life of the school community. Other alternatives did not provide the same level of monitoring, crime prevention/detection, prevention of public order, bullying incidents, or provide the same security and protection of students, staff, visitors, parents, and guardians.

### 6. What are the privacy issues arising from this surveillance camera system?

The use of a CCTV system can cause privacy issues such as

- a. **the misuse of the personal data recorded;** *this has been mitigated by the implementation of policies, training, recording over of personal data previously recorded, access controls, and records around access, and destruction of recorded footage.*
- b. **the position of CCTV cameras that could record passers-by or another person's private property;** *the ability to inspect the viewing / recording areas of the CCTV cameras together with access controls, positioning of CCTV cameras and CCTV Policies / Records mitigates against such issues.*

- c. **access through 'built-in backdoor's intended for maintenance access as well as security flaws in firmware;** *the supplier and installer of the CCTV system have addressed such issues through their built-in access and security programming.*
- d. **malicious software built into cameras to allow remote unauthorised administrative access via the web;** *the CCTV system was purchased from a reputable supplier and is serviced and maintained by professionals when required, these facts together result in the school being notified if any such malicious software was discovered or suspected in the CCTV system operated by the school, thus mitigating against such an issue.*
- e. **lack of security protection of personal data recorded on the CCTV systems:** *the CCTV system was purchased through a reputable supplier and maintained by CCTV professionals who will notify the school of any security issues should they should arise, together with the policies, procedures, access control mitigates against such issues.*
- f. **theft as a result of the positioning of CCTV cameras within the organisation:** *the fact that the CCTV system was purchased through a reputable supplier and maintained and positioned by CCTV professionals, as well as the fact that the CCTV cameras recording capabilities are visible through the CCTV monitors by the school's administrator mitigates against any such security / privacy issues.*
- g. **theft / unauthorised access of the visual surveillance of data itself:** *the fact that the school's CCTV system was purchased from a reputable supplier and is serviced and maintained by professionals when required, would result in the school being notified if any such unauthorised access was discovered in the CCTV system operated by the school, together with implemented polices, monitoring and access controls mitigating against such privacy issue.*
- h. **Privacy issues resulting from the storage location of personal data recorded on the CCTV system:** *the storage of the CCTV recordings by the school is subjected to the organisational and technical security measures implemented to protect the data during its processing and thus mitigates against the risk of a data breach in respect of the storage of such personal data and privacy issue. The recording over functionality also reduces the risk associated with storage of this data. The additional recording mechanisms introduced in relation to the downloaded of CCTV records together with details of the persons to whom they were shared with also assists in the mitigation against such privacy issue.*
- i. **unauthorised sharing of CCTV recording:** *the implementation of organisational and technical security measures together with the CCTV policy and recording mechanisms that have been implemented to record the authorisation for downloading of CCTV recordings, to whom shared, together with other relevant measures that have been designed to prevent unauthorised sharing of recorded CCTV images mitigate against any such issue.*
- j. **lack of records in relation to downloading the recordings:** *the implementation of organisational and technical security measures, together with the CCTV policy and recording mechanisms to record the authorisation for downloading, to whom*

*shared, together with other relevant measures that have been designed to prevent and mitigate against any such issue.*

- k. **lack of a file expiry management system of CCTV recordings of personal data downloaded:** *the implementation of organisational and technical security measures together with a file expiry management system where CCTV recordings are recorded over every 30 days, mitigates against this risk.*
- l. **lack of procedures for the destruction of CCTV recordings downloaded and no longer required for processing:** *the implementation of recording mechanisms for the authorisation and sharing of downloaded CCTV, a file expiry management system, the annual reviewing of personal data due to be destroyed, the existence of a Data Protection Policy, Personal Data Retention Policy, Data Security Policy, Disposal and Destruction Policy, Training Policy, Encryption Policy, CCTV Policy, Cloud Storage Services Policy, Password Policy together mitigate against such issues.*
- m. **risk to personal data downloaded from the CCTV system when being transmitted or stored:** *the implementation of organisational and technical security measures together with the installation of **ProtectorApp email attachment and encryption application** allows for downloaded footage to be password protected and encrypted when being transmitted, shared or stored.*
- n. **unauthorised viewing by other staff members or members of the public:** *the access controls, CCTV policies and recording mechanisms implemented, together with the GDPR and Data Protection Acts awareness training mitigates any such issues.*
- o. **lack of documentation such as CCTV policy and procedure:** *the implementation of Data Protection Policy, Personal Data Retention Policy, Data Security Policy, Disposal and Destruction Policy, Training Policy, Encryption Policy, CCTV Policy, Cloud Storage Services Policy, Password Policy and CCTV recording mechanisms for the storage and sharing of authorised downloaded recordings from the CCTV system mitigates against such issues.*
- p. **Recording of personal data overlooking of private dwellings/ areas:** *the positioning and location of the CCTV cameras were chosen to ensure that they **do not overlook any private dwelling/area**. The administrator viewing capabilities of the camera's field of view through the CCTV Monitors reassures that this privacy issue does not arise.*

#### 7. Has any privacy by design features been adopted to reduce privacy intrusion?

The implementation or installation of a '**privacy zones**' was not required, as the **CCTV system does not overlook any residential area**. However, the implementation of automatic deletion after **30 days** of recorded data from the system, the restricted access to the CCTV monitor and controlling mechanism, together with the measures to ensure secure handling and storage of recorded / downloaded data, the annual reviews, staff training and

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

Page | 8

supervision of processing, together demonstrated privacy by design features that have been adopted and implemented to reduce such privacy intrusion.

### 8. What organisations or persons will have access the CCTV images / recordings?

Principal, Board of Management, Court Orders, Gardai, Appointed Investigators, Staff, Representatives of the Department of Education and Skills, the HSE and/or the Parent / Guardian of a recorded student, Insurance Company pursuant to a claim for damages and any other Statutory Body charged with Child Safeguarding depending on the circumstances and necessity for the viewing of CCTV images or recordings in each case.

### 9. Do the images need to be able to identify individuals, or could the scheme use other images not capable of identifying individuals?

The CCTV system's cameras can identify individuals whose image are recorded. They provide the best evidential evidence when required for identification purpose. The recorded images can also identify registration numbers of vehicles entering the area and provide assistance in relation to child protection and safety concerns. The fact that the CCTV cameras recorded images that can identify individuals is a deterrent and necessitated the implementation of a CCTV system.

### 10. Will the CCTV system camera equipment being installed, and the system of work being adopted be sustainable?

St. Joseph's Secondary School owns and manages its CCTV system. The school is committed to provide the capital and ongoing annual revenue costs to upkeep and maintain its CCTV system.

### 11. Will the particular system/equipment being considered deliver the desired benefit now and in the future?

The CCTV system has been designed and upgraded to a good standard. Maintenance of the CCTV system is conducted by a reputable company. The reputable company keep St. Joseph's Secondary School updated on new technological advancement and this information will be considered along with the annual review so as to ensure that the system and its equipment continues to deliver the desired benefits now and in the future.

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

There are no future demands or plans for further processing other than the purposes of processing that is currently undertaken by the school's CCTV system.

**13. Where a CCTV System is in use, what technical and organisational measures have been implemented in accordance with the requirement of data protection by default?**

The technical and organisational measures implemented in respect of data protection by default ensure that only personal data which is necessary for a specific purpose is processed. This has been enhanced by the decisions on the placement of CCTV cameras, the focus of the cameras, the capability of the cameras, the functionality of the cameras (pan, tilt, zoom etc.) and privacy masking features (where necessary), as well as the retention period.

**14. What factors were taken into consideration in relation to the proportionality of the risks to privacy versus the installation of a CCTV system?**

The proportionality assessment of the use of a CCTV system took factors such as the size of the area to be covered, the number of locations where high volume of movement occurs, open access to the grounds of St Joseph's Secondary School, the storage of personal property, entrances, corridors and blind spots etc. which require monitoring during the day and evening in to consideration and it was decided that the provision of CCTV system operating 24/7 was required to ensure the best security of the premises, equipment, as well as any staff or students that may be present during or after school hours.

**15. When deciding to implement a CCTV system did the controller when assessing the proportionality of the use of CCTV system versus the right to privacy, take into consideration the fact that staff monitoring using a CCTV system should only occur in special circumstances?**

Yes, the controller took this aspect into consideration and clearly stated in the CCTV policy that the CCTV system will not be used to monitor normal teacher / student classroom activity in the school and that the use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited e.g. CCTV will not be used for monitoring employee performance. The policy also states that it prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g., race, gender, sexual orientation, national origin disability etc.

- 16. When deciding to implement a CCTV system did the controller when assessing the proportionality of the use of CCTV system versus the right to privacy by members of the public, take into consideration the extent to which public areas may be under surveillance and monitored?**

Yes, the controller took this aspect into consideration and clearly stated in the CCTV policy that the CCTV system monitoring of public areas for security reasons within school premises is limited to uses that does not violate the individual's reasonable expectation to privacy and that video monitoring of public area is limited to uses that do not violate members of the public's expectation to privacy.

- 17. When deciding to implement a CCTV system did the controller when assessing the proportionality of the use of CCTV system versus the right to privacy of young or vulnerable people take into consideration the extent to which they may be affected by surveillance and being monitored?**

Yes, the controller took this aspect into consideration and clearly stated in the CCTV policy that the CCTV system is to monitor the movement of data subjects external to and within the premises for security health and safety, protecting data subjects, staff and the school, as well as stating that the use of CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by the CCTV policy. Most importantly it states that CCTV monitoring of public areas within school premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

- 18. When deciding to implement a CCTV system did the controller when assessing the proportionality of the impact of CCTV recording system take into account the expectation of privacy people may have when they are on the premises?**

Yes, the controller took this aspect into consideration and clearly stated in the CCTV policy that the CCTV system is limited to uses that do not violate the individual's reasonable expectation to privacy and the selection of areas for the installation of CCTV cameras were chosen with the aspect of being least intrusive in relation to the privacy of individuals. A CCTV Data Impact Assessment has been conducted in respect of the use of the CCTV system to adequately assess the other purposes which are outlined at point 6 of the CCTV Policy.

- 19. Where a CCTV System is in use what measures have been put in place to ensure that CCTV recordings are safe and secure, both technically and organisationally?**

Personal data is protected by means of both technical and organisational measures implemented; technically measures implemented include secure transit and storage, access controls, username, passwords, network security, data minimisation, monitoring and auditing, secure storage and regular software updates. Organisational measures implemented include data protection policies,

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

Page | 11

CCTV policy, CCTV personal data Impact assessment, incident response plan, data retention and disposal policies, CCTV legitimate interest assessment etc.

### 20. Where a CCTV System is in use how is access to CCTV recordings managed?

Only authorised personnel are given username and password to access live feeds or recorded footage of the CCTV system. Data access requests are monitored and recorded in the CCCTV data access request forms. All recordings are recorded over every 30 days unless required for other lawful purposes.

### 21. What technical and organisational measures have been implemented to ensure that personal data are kept secure from any unauthorised or unlawful processing and accidental loss, destruction or damage?

The implementation of robust policies and protocols are designed to ensure personal data processed through the CCTV System is protected. CCTV related personal data is protected from unauthorised or unlawful processing and accidental loss, destruction or damage by technical measures such as secure transit and storage, access controls, username, passwords, network security, data minimisation, monitoring and auditing, and regular software updates. Organisational measures.

### 22. Does any CCTV system monitoring occurring in areas where data subjects have an increased expectation of privacy such as break rooms, changing rooms or toilets?

No CCTV system monitoring occurs in areas where data subjects have an increased expectation of privacy.

## European Convention on Human Rights.

St. Joseph's Secondary School is very conscious of its obligations to ensure that the CCTV system does not contravene any of the rights guaranteed by the European Convention on Human Rights, especially under Article 8, which states that *everyone has the right to respect for his/her private and family life, his home and his correspondence.*

### 1. Is the system established on a proper legal basis and is it operated in accordance with the law?

The CCTV system is owned and managed by St. Joseph's Secondary School. The recording of personal data through its CCTV system complies with the principals of the General Data Protection Regulations (GDPR) and Data Protection Acts in that the 'lawful purpose' for such processing is one of 'Legitimate interests'

**2. Is the system necessary to address a pressing need, such as public safety, crime prevention or national security?**

All of the Cameras on the CCTV System have been placed in areas so as to provide the required benefits of securing the premises, supporting workplace safety management, aiding the prevention and detection of crime, preventing vandalism, preventing or eliminating unauthorised intruders, monitors busy areas, preventing bullying, deterring sex offenders, monitoring visitors, aiding in emergency evacuations and providing peace of mind so as to improve the quality of life of the school community.

**3. Is it justified in the circumstances?**

CCTV cameras placed in plain sight has been shown to reduce criminal activity, prevent vandalism, protect property, eliminate unauthorised intruders, monitor busy areas, prevent bullying, deter sex offenders, monitor visitors, aid in emergency evacuations and provide peace of mind and improve the quality of life of the school community through the integration of best practices governing the private surveillance of the premises and its curtilage, thus ensuring a secure environment for or the provision of education to the students as required by the enactment of school legislation by the Department of Education and Skills. These benefits together with child safety requirements justify the provision of the CCTV system.

**4. Is it proportionate to the problem that it is designed to deal with?**

The CCTV system has been deemed proportional by its proven success in assisting in keeping staff, students, parents/guardians, visitors and the school safe.

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

St. Joseph's Secondary School's CCTV System and its staff are managed and audited by Board of Management to ensure that there are no breaches of any kind of discrimination. The location of the CCTV system cameras do not give rise to any discriminatory or disproportionate impact in respect of any particular section of the community or ethnic group.

**PRIVACY IMPACT ASSESSMENT LEVEL TWO**

This document is a record of the various placement and devices used in the surveillance camera system and is used to demonstrate St. Joseph's Secondary School's recognition and

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

commitment to the reduction of risk to privacy impact across the network or system. The implementation, review and use of the CCTV system takes in to account the effect on individuals and their privacy.

This section assists in identifying CCTV Camera(s) (irrespective of the type) that may be directed at more vulnerable area(s) (children playing areas, locker area etc.) and present a higher privacy risk. This will allow St. Joseph's Secondary School to document a generic approach to the identified intrusion into privacy, by creating a catalogue of the cameras by 'type' and 'location' and identifying any camera that presents specific privacy issues or risks in order for St. Joseph's Secondary School to be in a position to document the mitigations taken against such risks.

It is important to identify where St. Joseph's Secondary School's cameras are sited. An asset register of all CCTV devices is maintained in order to record each site and the equipment installed therein.

### Level Two

#### Step 1 (definition of camera types utilised)

Cameras Specification: St. Joseph's Secondary School has included details of all camera types and system capabilities (e.g. static, pan-tilt-zoom (PTZ), panoramic, Automatic number plate recognition (ANPR)) and their likely application and expected use.

| ID | Camera Types | Make & Model Used                                | Amount | Description         | Justification and Expected Use   |
|----|--------------|--|--------|---------------------|--|
| 1  | Static HD    | HikVision DS-2CD2347G2-LU 2.8 ColorVu & Acusense | 24     | Fixed image, No PTZ | Fully monitored and recorded 24hrs, staff, students, parents/guardian's, visitors and school's safety. |

#### Step 2 (location assessment) Location:

St. Joseph's Secondary School has listed and categorise the different areas covered by its CCTV cameras on their system. This list is used to show from the specifications above which camera types are used at each specific location.

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

| CAT | Location Type         | Camera Types used | Amount | Recording | Monitoring           | Assessment of use of equipment (mitigations or justifications)  |
|-----|-----------------------|-------------------|--------|-----------|----------------------|---|
| A   | Entrances Side Stairs | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the entrances is very low; the entrance is well signed with appropriate signage for CCTV.    |
| B   | External Side Ramp    | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the entrances is very low; the entrance is well signed with appropriate signage for CCTV.    |
| C   | Outside Yard          | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the outside yard is very low; the entrance is well signed with appropriate signage for CCTV. |
| D   | Top Entrance          | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the entrances is very low; the entrance is well signed with appropriate signage for CCTV.    |
| E   | Side Door             | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the entrances is very low; the entrance is well signed with appropriate signage for CCTV.    |
| F   | Front Gate            | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the entrances is very low; the entrance is well signed with appropriate signage for CCTV.    |
| G   | Outside Staff Room    | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.            |
| H   | Corridor              | Static            | 1      | 24hrs     | 24hrs (No operators) | The privacy level expectation in the corridor is very low; school is well signed with   |

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

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|   |                         |        |   |       |                      | appropriate signage for CCTV.   |
| I | Hallway Main Building   | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.  |
| J | Gym                     | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the Gym is very low; school is well signed with appropriate signage for CCTV. This CCTV footage is only view in the event of an incident and is access controlled. |
| K | Main Lobby              | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the lobby is very low; school is well signed with appropriate signage for CCTV.  |
| L | Side Exit               | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the exit is very low; school is well signed with appropriate signage for CCTV.   |
| M | Hall                    | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hall is very low; school is well signed with appropriate signage for CCTV.   |
| N | North Entrance          | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the entrance is very low; school is well signed with appropriate signage for CCTV.   |
| O | New wing lockers        | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the locker area is very low; school is well signed with appropriate signage for CCTV.  |
| P | Hallway boys toilet     | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.  |
| Q | Hall outside staff room | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.  |

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

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|   |                               |        |   |       |                      | appropriate signage for CCTV.   |
| R | Old boiler house              | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.  |
| S | Prefab Carpark                | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the carpark is very low; school is well signed with appropriate signage for CCTV.  |
| T | Side hallway                  | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.  |
| U | rear of link corridor         | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the corridor is very low; school is well signed with appropriate signage for CCTV. |
| V | rear of link corridor         | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the corridor is very low; school is well signed with appropriate signage for CCTV. |
| W | new link corridor             | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the corridor is very low; school is well signed with appropriate signage for CCTV. |
| X | Carpark outside main entrance | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the carpark is very low; school is well signed with appropriate signage for CCTV.  |
| Y | outside of home economic room | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV.     |
| Z | outside of home               | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well   |

# St. Joseph's Secondary School

## CCTV Personal Data Privacy Impact Assessment

|    |                                  |        |   |       |                      |  |
|----|----------------------------------|--------|---|-------|----------------------|--|
|    | economic room                    |        |   |       |                      | signed with appropriate signage for CCTV.  |
| AA | Main carpark main entrance       | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the carpark is very low; school is well signed with appropriate signage for CCTV.   |
| BB | Preschool                        | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV.      |
| CC | Mail Hall                        | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.   |
| DD | Left back exit hall              | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the exit area is very low; school is well signed with appropriate signage for CCTV. |
| EE | Back Entrance / Principal Office | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the entrance is very low; school is well signed with appropriate signage for CCTV.  |
| FF | Top Entrance                     | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the entrance is very low; school is well signed with appropriate signage for CCTV.  |
| GG | Outside staff room               | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV.      |
| HH | New hall                         | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the hallway is very low; school is well signed with appropriate signage for CCTV.   |
| II | Book Store hallway               | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well  |

# St. Joseph's Secondary School CCTV Personal Data Privacy Impact Assessment

|    |  |        |   |       |                      |   |
|----|--|--------|---|-------|----------------------|---|
|    |  |        |   |       |                      | signed with appropriate signage for CCTV.   |
| JJ | Outside entrance to library and staff room | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |
| KK | Internal hallway                           | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |
| LL | Exit door                                  | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |
| MM | Library hallway                            | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |
| NN | Ag science room hallway                    | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |
| OO | Back Exit Principal's office               | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |
| PP | Link Corridor                              | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |
| QQ | Outside rear exit principal office.        | Static | 1 | 24hrs | 24hrs (No operators) | The privacy level expectation in the area is very low; school is well signed with appropriate signage for CCTV. |

## Step 3 (Cameras where additional mitigation required)

### Asset register:

St. Joseph's Secondary School maintains an asset register for all of its devices so as to record each site and equipment installed therein categorised in a manner so as to lead into the level two process.

# St. Joseph's Secondary School CCTV Personal Data Privacy Impact Assessment

**Note:** Please document here any additional mitigation taken on a camera or system to ensure that privacy is in line with the ECHR requirements.

| Camera Number | Reviewed | Camera Type | Location Category | Further mitigation / comments (Optional) |
|---------------|----------|-------------|-------------------|--|
| None Required |          |             |                   |  |
|               |          |             |                   |  |
|               |          |             |                   |  |
|               |          |             |                   |  |
|               |          |             |                   |  |
|               |          |             |                   |  |
|               |          |             |                   |  |
|               |          |             |                   |  |

## Step 4 (Mitigation for specific cameras that have high privacy risks)

In the event of a very high impact risk St. Joseph's Secondary School will conduct an extensive PDPIA for the specific installation(s) and the site(s) and document it fully.

### PIA for specific installations

|                 |               |
|-----------------|---------------|
| Camera number   | 0             |
| Camera location | None required |

| Privacy Risk(s) | Solution | Outcome (If the risk is removed, reduced or accepted) | Justification (is the impact after implementing each solution compliant and proportionate to the aim of the cameras?) |
|-----------------|----------|---|---|
| None            |          |   |   |
|                 |          |   |   |
|                 |          |   |   |

# St. Joseph's Secondary School CCTV Personal Data Privacy Impact Assessment

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