

DPIA Report

Account Name

Glade Academy

DPIA Title

CCTV

Report Date

30-09-2025 09:13

Identify the need for a DPIA

Need

Reduction in vandalism and break in to the property.
Student behaviour.
Accidents / Injuries
Confrontation, aggression, physical incidents.
Reduce crime
Prevention of any criminal activity including trespassing.
Support with health & safety.
Collect data for criminal conviction - if needed

Describe the Processing

Nature of Processing

CCTV images. Stored on a secure hard drive unit. Images automatically deleted after 30 days. The source of the data will be pupils, staff, contractors, parents / carers and any other visitor to site. People trespassing after hours.
Data may be shared with police, insurance companies, parents (SAR), staff.

Scope of Processing

Special categories - ethnicity, disabilities
Criminal data - theft, trespassing, vandalism, breaking & entering, violent/aggressive acts, inappropriate behaviour.
Data collected remains on the system for 30 days, after which it is automatically deleted.
CCTV covers Glade Academy site only. It does not cover any private residences.
CCTV operates 24hrs a day.
Any individual who comes onto Glade Academy's grounds will be affected by the CCTV.

Context of Processing

Visitors

Pupils

Staff

Parents

Contractors

Privacy policies in place explaining how their data is used and stored.

Images will include children and potentially other vulnerable groups.

CCTV system password protected and live footage is not visible to passer-by's. Retention period of footage is 30 days.

Role dependant access to the CCTV system (live and recorded), password protected. SLT to authorise access to the recorded CCTV data and this is logged.

Purpose of Processing

Reduction in vandalism and break in to the property.

Student behaviour.

Accidents / Injuries

Confrontation, aggression, physical incidents.

Collect data for criminal conviction - if needed

Reduce crime.

Prevention of any criminal activity including trespassing.

Support with health & safety.

Consultation Process

Consultation

Governors

Suffolk County Council (LA)

Wider community

Central Trust

Assess Necessity and Proportionality

Necessity

Legal processing - public task & lawful basis for special category data.

Public task - carrying out a task in the public interest and exercise official authority, there is not another reasonable and less intrusive way to achieve the same result.

Lawful basis for special category data - Legal claims or judicial acts & reasons of substantial public interest (with a basis in law) such as preventing or detecting unlawful acts and Safeguarding of children and individuals at risk.

The data processing does achieve it's purpose.

Function creep - only certain people (role dependant) have access to the CCTV, password protected. SLT to authorise whether the task concerned is an appropriate use of retrieving the CCTV data. Access is logged.

Plenty of CCTV signs located around site and helping parents to locate our website for the policies and guidance, explaining their legal rights and our obligations to protecting their

data.

Individual rights adhered to - the right to be informed about the collection and the use of their personal data

the right to access personal data and supplementary information

the right to have inaccurate personal data rectified, or completed if it is incomplete

the right to erasure (to be forgotten) in certain circumstances

the right to restrict processing in certain circumstances

the right to data portability, which allows the data subject to obtain and reuse their personal data for their own purposes across different services

the right to object to processing in certain circumstances

rights in relation to automated decision making and profiling

the right to withdraw consent at any time (where relevant)

the right to complain to the Information Commissioner

Identify and Assess Risks

Risk	Source of risk and nature of potential impact on individuals	Likelihood of Harm	Severity of Harm	Overall Risk
Insufficient signage	Invasion of privacy if you do not know you are being filmed.	Probable	Significant	High
Cyber attack	Being hacked by an unknown source	Probable	Severe	High
Unauthorised access	Unauth access within organisation	Possible	Significant	High
Individuals unaware of how to exercise rights over CCTV		Probable	Significant	Medium
Poor maintenance of CCTV system	Poor maintenance may lead to the systems breaking down, not working effectively.	Possible	Severe	High
Power outage	Loss of power would be there would be no data recorded. No battery backup or surge protection.	Probable	Significant	Medium
Failure of hard drive	Loss of footage / data - unable to retrieve data.	Possible	Severe	High

Identify Measures to Reduce Risk

Risk	Risk Measure	Effect on Risk	Residual Risk	Measure Approved
Insufficient signage	Put sufficient signage around school site. QR code available to access CCTV policy	Eliminated	Low	Yes
Cyber attack	Privacy policy Website QR code to CCTV policy on signage	Eliminated	Low	Yes
Poor maintenance of CCTV system	Annual servicing carried out on CCTV equipment and any recommended repair works actioned.	Reduced	Low	Yes
Individuals unaware of how to exercise rights over CCTV	Privacy policy available on website. Adequate signage around site. QR code to enable public to read CCTV and Privacy policy	Eliminated	Low	Yes
Unauthorised access	System password protected. Only relevant staff have knowledge of the password. Monitor not visible to passer-by's (screen switched off). Each time CCTV is accessed it is logged into book, stating who looked at it, the reason why and who authorised the action.	Reduced	Low	Yes
Failure of hard drive	Annual maintenance carried out on all CCTV equipment and remedial works actioned in a timely manner.	Reduced	Low	Yes
Power outage	Loss of power as a result of bad weather, uncontrollable. Discuss with IT about incorporating a battery back in case of a power cut.	Accepted	Medium	Yes

Sign Off and Record Outcomes

Item	Name / Date
Measures Approved by:	GDPR Sentry
Date	25-11-2024
Residual Risks Approved by:	GDPR Sentry
Date	25-11-2024
DPO Advice Provided by:	GDPR Sentry
Summary of DPO Advice: Advice received on 09/10/2024 - Based on our review GDPR Sentry have seen that there are some crucial sections that have not been included in this DPIA. GDPR Sentry would recommend that you include sections for; Retention of personal data. Individual's Rights. The lawful basis for a public task needs to be explained further. Currently the purpose for the CCTV is for the prevention and detection for crime, meaning you are not actively looking to process ethnicity or disability data meaning this will not currently require lawful basis. If you are intending to collect criminal conviction data, you will need to establish a lawful basis for special category data. The Consultation Process could also include, date of consultation, views raised, measures taken. 25/11/2024 - Yes, GDPR Sentry have reviewed your DPIA and believe it is sufficient to be signed off.	
DPO Advice Accepted or Overruled by:	Accepted by Judith George
Reasons DPO Overridden:	
Consultation Responses Reviewed by:	
Reasons for departing from views:	
This DPIA will be kept under review by:	