



Data Protection Impact Assessment (CCTV)

Trinity School

Trinity School is a boarding school that operates a CCTV system across its site. As such, Trinity School must consider the privacy implications of the system, alongside a number of other issues. Completion of this Data Protection Impact Assessment (DPIA) highlights the key implications, including the additional privacy expectations that arise from the School's boarding provision.

A DPIA is also recommended by the Surveillance Camera Code of Practice, which sets out the guiding principles that should be applied when CCTV systems are in place, to ensure that privacy risks are minimised whilst the aims of the CCTV system are met.

This DPIA looks at the wider context of privacy, taking into account data protection law and the Human Rights Act. It considers the need for the CCTV system and the impact it may have on individual privacy – an impact that is heightened for a boarding community where pupils live on site.

This DPIA helps determine whether the proposed system can be justified as proportionate to the needs of the School. In undertaking this DPIA, Trinity School has considered its obligations under data protection law.

Trinity School recognises that changes do occur and, on this basis, good practice recommends that the School review this DPIA periodically. The School recognises that it is good practice to undertake a DPIA before a system is put in place, and follows the Surveillance Camera Commissioner's Passport to Compliance. The School also maintains a separate CCTV Policy. A DPIA will typically consist of the following key steps:

- Identify the need for a DPIA.
- Describe the information flow.
- Identify data protection and related risks.
- Identify data protection solutions to reduce and eliminate the risks.
- Sign off the outcomes of the DPIA.



Step 1: Identify the need for a DPIA

What is the aim of the project? CCTV consistently delivers benefits in terms of improved health, safety and security across boarding schools. As a school where pupils live on site outside of the school day, Trinity School's CCTV system complements other security and safeguarding measures already in place, including door entry systems, boarding house duty staff and overnight supervision arrangements.

CCTV aims to achieve the following:

- Improve the health, safety and security of pupils (including boarders), staff and visitors, both during and outside the school day
- Protect the school buildings, boarding houses and internal infrastructure, including out of term time
- Support the School's safeguarding responsibilities for boarding pupils
- Improve pupil behaviour and reduce vandalism
- Provide assistance in the detection and prevention of crime
- Monitor site access points and perimeter security overnight and during holiday periods

Parents have the assurance that their children are safe whilst in School, including overnight as boarders. Parents are aware that CCTV also has the potential to improve pupil behaviour. The Board of Governors is of the same view.

Trinity School has updated its Privacy Notice for its CCTV system. The Privacy Notice sets out what personal information is used, the lawful basis for using it, who the School will share it with, and how long it will be kept. The Privacy Notice (Pupil) and Privacy Notice (Workforce) also document the rights an individual has regarding their personal information.

Reference is made to the CCTV system in the School's Information Asset Register.

Step 2: Describe the processing

How will you collect, use, store and delete data? Following installation, the CCTV system provides the School with images from 20 fixed cameras located throughout the site. All 20 cameras are overt – none are concealed – and images are transmitted to and captured on a digital video recorder (DVR). Recording is motion-activated: cameras only record when motion is detected within their field of view, rather than continuously, which helps minimise the amount of footage captured. The system covers the site continuously (24 hours a day, 7 days a week, including overnight and during School holidays, which is of particular importance to a boarding school), but footage is only generated in response to detected movement.

Images are transmitted to a DVR housed in a locked room with access restricted to authorised staff. Access to the School site is via a secure door entry system, and School reception is staffed throughout the school day. Images are stored on the hard drive of the DVR.



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Transmitted images can be viewed live, out of public sight in the main office, by a member of the office team and by the Senior Leadership Team (SLT). Viewing is restricted to these individuals and is not visible or accessible to pupils, parents or other visitors passing through the office. This is documented in the School's CCTV Policy and helps maintain site security, access control, and pupil and staff safety – including the safety of boarders out of school hours.

What is the source of the data? The CCTV system provides still/video images transmitted from 30 fixed cameras positioned around the site. All cameras are overt, clearly visible, and fixed on a particular scene; none are concealed or capable of covert use. Cameras are sited to cover entrances, communal areas, car parks and the site perimeter.

Will you be sharing data with anyone? Information is used to ensure the health, safety and security of pupils (including boarders), staff and visitors. It can be used to detect unauthorised visitors, support behaviour management, and protect School assets. Information may be shared with the Senior Leadership Team and the Police for investigation and enforcement purposes.

Disclosure of data is covered by the School's internal processes, which are fully compliant with relevant legislation and Codes of Practice (see the School's CCTV Policy).

What types of processing identified as likely high risk are involved? Recording of images; secure storage of images; and application of an appropriate data retention period. The DVR is located in a locked server room / cabinet, and access to images is password protected.

Individuals can request copies of CCTV data containing their personal information by submitting a subject access request.

What is the nature of the data? The CCTV data captured is still and video recordings.

Special category data? By default, CCTV may capture special category data, including data revealing race/ethnic origin and, in some circumstances, health information (for example, if an individual is seen using mobility equipment).

How much data is collected and used, and how often? The CCTV system covers the site 24 hours a day, 7 days a week, reflecting the boarding nature of the School, but recording is motion-activated rather than continuous, so footage is only generated when movement is detected within a camera's field of view.

How long will you keep the data for? Motion-activated recordings are retained for 24 hours and are then automatically deleted, unless a recording is required as part of an incident, in which case the relevant footage is extracted and archived for the duration of the investigation, or for 12 months, whichever is shorter. This retention period should be reflected in Trinity School's Data Retention Policy. A short, motion-activated retention period of this kind supports data minimisation, though the School should ensure 24 hours is sufficient in practice for incidents to be identified and flagged for retention before automatic deletion (for example, overnight incidents that are not reported until the following day).

Scope of data obtained? CCTV images are obtained within the confines of the School site only, including boarding houses' external entrances and communal external areas, but not inside private boarding accommodation (see Step 2, context, below).

What is the nature of your relationship with the individuals? The School provides education and, for boarders, residential care, on a term-time (and where applicable holiday) basis. Staff deliver the curriculum



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and boarding staff provide pastoral supervision. The School receives a number of visitors on a daily basis, including contractors, inspectors, and agency staff.

How much control will they have? The School informs pupils, staff and visitors that CCTV is in use by installing clearly visible signs at entry points to the site, including the main vehicle and pedestrian access points and boarding house entrances. Signs identify Trinity School as the data controller and provide a contact telephone number. As all cameras are overt and clearly signed, individuals are able to see and avoid camera coverage where they wish to do so, other than at monitored entrances and communal areas.

The CCTV system is capable of identifying individuals, and images may be used in criminal and civil court proceedings.

Where a Subject Access Request is made, data may be downloaded or copied for release to the data subject or a third party. Each request must be made via a signed data release form. In the case of the Police, a request may be authorised by an officer of the rank of Sergeant or above, using a WA170 form.

Do they include children or other vulnerable groups? Yes. Cameras are located in areas where pupils (including boarders) and staff have access. As this is a boarding school, particular care has been taken with camera placement: cameras cover external entrances, communal circulation areas, car parks and the site perimeter only. No cameras are located inside boarding house bedrooms, dormitories, bathrooms, changing rooms or other areas where a heightened expectation of privacy applies. No cameras are aimed at private residential accommodation. CCTV signage is clearly visible from public areas and from the street where relevant.

Are there prior concerns over this type of processing or security flaws? The School has a CCTV Policy, and the newly installed system is operated in line with relevant legislation and the Surveillance Camera Code of Practice, including in respect of data retention. It is recommended that staff operating or using the system have undertaken data protection and information security training.

Is it novel in any way? The 20-camera system represents a new installation for Trinity School. All cameras are overt (non-concealed), fixed, and positioned for site security purposes only; no covert or audio recording capability is included.

The CCTV system is proportionate and justified. It also achieves the following benefits for the School:

- Demonstrates a duty of care to pupils (including boarders), staff and visitors, at all times including overnight
- Protects the fabric of the School, both externally and internally
- As a consequence, allows budgets to be reduced or deferred to other school projects
- Encourages improved pupil behaviour
- Provides assistance in the detection and prevention of crime
- Assists in managing the School, including out-of-hours boarding operations

The CCTV system is referenced in the School's Privacy Notice (Pupil) and Privacy Notice (Workforce).

Step 3: Consultation process



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The newly installed system comprises 20 overt, fixed cameras across the site. Trinity School has considered the CCTV Passport to Compliance guidance as part of this installation.

The decision to install the CCTV system was agreed by Trinity School's Senior Leadership Team, in consultation with the Boarding Team given the residential nature of the School.

This will be communicated to parents, pupils and boarding staff via the School's CCTV Privacy Notice, published on the School website, and via boarding house information for new and returning boarders.

A list of camera locations is included at Appendix 1.

YourIG has also been engaged to ensure CCTV compliance.

Step 4: Assess necessity and proportionality

What is the lawful basis for processing? The lawful basis for processing is set out in the School's Privacy Notice (Pupil) and includes the following:

- Article 6 and Article 9 (special category data) under data protection law
- The common law duty of care
- Health and Safety at Work Act
- Safeguarding Vulnerable Groups Act
- Keeping Children Safe in Education / Working Together to Safeguard Children guidance (DfE)
- The National Minimum Standards for Boarding Schools, in respect of the safety and welfare of boarders

Does the processing achieve your purpose? Cameras are located in areas where pupils and staff have access, including boarding house entrances and communal external areas. Cameras are not located in areas where privacy is expected, such as bedrooms, dormitories, bathrooms or changing rooms.

Is there another way to achieve the same outcome? To support school and boarding house security, a locked-site policy has been adopted, along with improved external lighting and other physical security improvements.

How will you prevent function creep? The lawful basis for processing is set out in the School's Privacy Notice (CCTV). Where there are material changes to the way CCTV is used – for example, adding cameras or changing their purpose – the School will review its CCTV system to ensure continued compliance and to guard against function creep.

How will you ensure data quality and data minimisation? The School has considered the source of the data and will maintain a data retention policy identifying retention periods for CCTV, recorded in the Information Asset Register. All 20 cameras are fixed and overt, minimising the scope of collection to what is necessary for site security. The School will continue to comply with its CCTV Policy.

What information will you give individuals? The School informs pupils, staff and visitors that CCTV is in use via clearly visible signage at site entry points and boarding house entrances, detailing the scheme, its purpose and a contact telephone number. The School has a Privacy Notice covering its CCTV system.



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How will you help them support their rights? The School has a Subject Access Request procedure in place to ensure compliance with data protection law. CCTV signage states a contact telephone number, and the School will continue to comply with its Data Protection Policy.

Step 5: Identify and assess risks

Describe source of risk and nature of potential impact on individuals, including associated compliance and corporate risks.

Source of risk / potential impact on individuals	Likelihood of harm	Severity of harm	Overall risk
Positioning of overt CCTV cameras at boarding house and site entrance points and the impact on privacy of boarders	Possible	Significant	Medium
Housing of external CCTV cameras and ingress of water	Remote	Significant	Medium
Ongoing maintenance of CCTV equipment, preventing breakdowns etc.	Possible	Significant	Medium
CCTV policies and procedures not in place, leading to inconsistent use around boarding and safeguarding	Possible	Significant	Medium
Appropriate CCTV signage not in place at all entrances, including boarding house entrances	Probable	Minimal	Low
Training not undertaken by staff (including boarding/pastoral staff) using CCTV	Possible	Significant	Medium
Privacy Notice (Pupil / Workforce) not adequately reflecting boarding use of CCTV	Possible	Significant	Medium
Non-compliance when expanding or amending the School's CCTV system in future	Possible	Significant	Medium
Short 24-hour automatic deletion window results in relevant footage being lost before an incident (e.g. reported the following day) can be identified and flagged for retention	Possible	Significant	Medium

Step 6: Identify measures to reduce risk

Identify additional measures you could take to reduce or eliminate risks identified as medium or high risk in Step 5.



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Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure approved
Camera positioning near boarding accommodation	Site all cameras overtly, covering only entrances/communal external areas; exclude bedrooms, bathrooms and dormitories entirely	Reduced	Low	Yes
CCTV & ingress of water	Use waterproof, weatherproof camera enclosures for all external units	Reduced	Low	Yes
CCTV maintenance	Maintenance contract in place with security services provider	Reduced	Low	Yes
CCTV policies & procedures	Policies and procedures in place, including specific reference to boarding house use	Reduced	Low	Yes
Training	Data Protection and Information Security training undertaken by all staff (including boarding/pastoral staff) with CCTV access	Reduced	Low	Yes
Privacy Notices	Update Privacy Notices to include specific reference to CCTV and boarding house coverage	Reduced	Low	Yes
CCTV Passport to Compliance	Confirm the new 30-camera installation against guidance from the CCTV Passport to Compliance	Reduced	Low	Yes
24-hour retention window	Establish a clear daily process for boarding/pastoral and site staff to review and flag relevant footage for retention well within the 24-hour window; ensure staff know how to request extraction of footage relating to overnight or delayed-reported incidents	Reduced	Low	Yes

Step 7: Sign off and record outcomes

Item	Name / date	Notes
Measures approved by:	Kate Unsworth Aug 26	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Kate Unsworth Aug 2026	If accepting any residual high risk, consult the ICO before going ahead
DPO advice provided:	Yes	DPO should advise on compliance, Step 6 measures and whether processing can proceed



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Item	Name / date	Notes
Summary of DPO advice:	Ensure compliance with NMS. NO cameras within the boarding houses – only at the entrances.	Recommend that signage is confirmed at all entrances, including boarding house entrances, to meet industry standards. Include the system in Trinity School's Information Asset Register. Confirm the installation against the CCTV Passport to Compliance.
DPO advice accepted or overruled by:	Accepted. K. Unsworth August 2026	If overruled, reasons must be explained and recorded
Consultation responses reviewed by:	n/a	If the decision departs from individuals' views, reasons must be explained
This DPIA will be kept under review by:	Kate Unsworth Frances Baxter (DSL)	The DPO should also review ongoing compliance with this DPIA, particularly following any change to the CCTV system



Appendix 1: Camera locations

Trinity School operates 30 fixed CCTV cameras. All cameras are overt (clearly visible) and none are concealed. Cameras are positioned to cover site entrances, communal circulation areas, car parks and the site perimeter for security purposes. No cameras are located inside boarding accommodation, bedrooms, bathrooms, changing rooms or other areas where individuals have a reasonable expectation of privacy.

No.	Camera location (to confirm)	Internal / External
1	Main gates / vehicle entrance layby	External
2	Pedestrian entrance – blue gates	External
3	Main reception entrance – White House	External
4	Main reception – overlooking pavilion and astro	External
5	School car park	External
6	Slope from Prep / Swimming pool	External
7	Boarding house 1 – external entrance - MD	External
8	Boarding house 2 – external entrance – MD by B4	External
9	Boarding house 3 – external entrance - Chapel from stairs	Internal
10	Boarding house 4 – external entrance – Girls entrance from stairs	Internal
11	Dining hall entrance – Red corridor	Internal
12	Gym entrance	External
13	Quad	External
14	Main teaching block – Blue Corridor	Internal
15	Main teaching block – Red corridor stairs	Internal
16	Entrance to S teaching block	External
17	Pathway to Nursery	External
18	Site perimeter – north boundary (New Road)	External
19	Site perimeter – Farm Lane	External
20	Outside entrance to Science / Changing Room entrance	External