



# **CCTV DPIA (Data Protection Impact Assessment) 2026/28**

Effective Date: 1st September 2026

Last Reviewed: September 2025

Reviewed By: The Open Door Academy Team

Next Review Date: July 2028

Version: 2

# **CCTV DPIA**

## **(Data Protection Impact Assessment)**

### **2026/28**



## **Contents**

|                                                         |   |
|---------------------------------------------------------|---|
| Introduction.....                                       | 3 |
| CCTV Data Protection Impact Assessment (DPIA) .....     | 3 |
| Project Overview .....                                  | 3 |
| Why a DPIA Is Required: .....                           | 3 |
| Nature, Scope, Context, and Purposes of Processing..... | 3 |
| <b>3.1 Nature</b> .....                                 | 3 |
| <b>3.2 Scope</b> .....                                  | 4 |
| <b>3.3 Context</b> .....                                | 4 |
| <b>3.4 Purposes</b> .....                               | 4 |
| Consultation .....                                      | 4 |
| Assessment of Necessity & Proportionality.....          | 4 |
| <b>5.1 Lawful Basis</b> .....                           | 4 |
| <b>5.2 Data Minimisation</b> .....                      | 4 |
| <b>5.3 Transparency</b> .....                           | 5 |
| <b>5.4 Rights of Individuals</b> .....                  | 5 |
| Risks to Individuals: .....                             | 5 |
| Measures to Reduce or Eliminate Risks.....              | 5 |
| Data Retention.....                                     | 6 |
| Data Sharing .....                                      | 6 |
| System Security.....                                    | 6 |
| Approval & Sign-off .....                               | 6 |

# **CCTV DPIA**

## **(Data Protection Impact Assessment)**

### **2026/28**



#### **Introduction**

The Open Door Academy is structured exactly as required by the ICO and suitable for Directors, auditors, and Head of Academy.

#### **CCTV Data Protection Impact Assessment (DPIA)**

- Date Completed: September 2025
- Review Cycle: Annual or when system changes occur
- Completed by: Head of Academy
- Approved by: IT Director

#### **Project Overview**

- **Name of processing activity:** CCTV Monitoring System
- **Purpose:** To ensure the safety and security of students, staff, visitors, and academy property; to prevent and detect crime; to support safeguarding and behaviour management; and to assist investigations.
- **System description:** The academy operates fixed-position Doorbell camera on external areas. Footage is recorded on secure, encrypted systems with restricted access.

#### **Why a DPIA Is Required:**

A DPIA is required because CCTV involves:

- Systematic monitoring of publicly accessible areas
- Large-scale processing of identifiable individuals
- Potential safeguarding implications
- Processing of vulnerable groups (children)

This aligns with UK GDPR Article 35(3)(c) and ICO guidance.

#### **Nature, Scope, Context, and Purposes of Processing**

##### **3.1 Nature**

- Continuous video recording
- Limited live monitoring by authorised staff
- Storage of footage for up to 30 days
- Retrieval of footage for incident investigation
- Secure sharing with police or safeguarding agencies when necessary

# **CCTV DPIA (Data Protection Impact Assessment) 2026/28**



## **3.2 Scope**

- All individuals entering academy premises
- Approx. 50 individuals captured daily

## **3.3 Context**

- The academy supports vulnerable students, including those with SEND and safeguarding needs
- CCTV is part of wider safeguarding and behaviour systems
- The academy must comply with UK GDPR, DPA 2018, and ICO CCTV Code of Practice

## **3.4 Purposes**

- Crime prevention and detection
- Safeguarding and welfare monitoring
- Behaviour management
- Protection of academy property
- Supporting investigations

## **Consultation**

Stakeholders consulted:

- Senior Leadership Team
- Designated Safeguarding Lead
- Directors
- Staff representatives

Summary: Stakeholders agreed CCTV is necessary for safeguarding and security. Concerns about privacy were addressed through strict access controls, signage, and limited retention.

## **Assessment of Necessity & Proportionality**

### **5.1 Lawful Basis**

Article 6(1)(f) – Legitimate Interests The academy has a legitimate interest in protecting students, staff, and property.

### **5.2 Data Minimisation**

- Cameras positioned only where necessary
- No recording in private areas
- Access restricted to authorised staff
- Footage retained only for 30 days

# CCTV DPIA (Data Protection Impact Assessment) 2026/28



## 5.3 Transparency

- Clear signage displayed
- CCTV policy published on academy website
- DPIA available on request

## 5.4 Rights of Individuals

- Subject Access Requests permitted
- Redaction applied to protect third parties
- Requests may be refused if they compromise safeguarding or investigations

### Risks to Individuals:

| Risk                                              | Impact | Likelihood | Overall Risk |
|---------------------------------------------------|--------|------------|--------------|
| Unauthorised access to footage                    | High   | Low        | Medium       |
| Excessive monitoring                              | Medium | Low        | Low          |
| Misuse of footage                                 | High   | Low        | Medium       |
| Data breach (loss or theft)                       | High   | Low        | Medium       |
| Inadequate signage / lack of transparency         | Medium | Low        | Low          |
| Harm to vulnerable students if footage is misused | High   | Low        | Medium       |

### Measures to Reduce or Eliminate Risks

| Risk                  | Mitigation Measures                                             | Residual Risk |
|-----------------------|-----------------------------------------------------------------|---------------|
| Unauthorised access   | Password-protected system; access logs; restricted staff access | Low           |
| Excessive monitoring  | Cameras placed only in necessary areas; no covert monitoring    | Low           |
| Misuse of footage     | Staff training; disciplinary policy; strict sharing rules       | Low           |
| Data breach           | Encrypted storage; secure servers; automatic overwrite          | Low           |
| Lack of transparency  | Clear signage; published CCTV policy                            | Low           |
| Safeguarding concerns | DSL oversight; secure sharing protocols                         | Low           |

# **CCTV DPIA**

## **(Data Protection Impact Assessment)**

### **2026/28**



#### **Data Retention**

- Standard retention: 30 days
- Extended retention only for active investigations
- Automatic deletion after retention period
- Retention schedule reviewed annually

#### **Data Sharing**

Footage may be shared with:

- Police
- Local Authority safeguarding teams
- Legal representatives
- Insurers (where relevant)
- All sharing is logged and authorised by the Directors or DSL.

#### **System Security**

- Encrypted storage
- Audit logs
- Regular maintenance and testing
- Annual review by IT Director

#### **Approval & Sign-off**

|                   |                                                                                     |       |                |
|-------------------|-------------------------------------------------------------------------------------|-------|----------------|
| IT Director name: | David Washington                                                                    | Date: | September 2026 |
| Signature:        |  |       |                |