



Schools Data Protection Register

1.	PROCESS	CCTV
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SECTION 1: SCHOOL DETAILS		
1.	School Name	Parc Lewis Primary School
2.	School Category	Primary School
3.	Information Asset Owner (IAO)	Alun Roberts
4.	School Data Protection Lead	Beth Gogherty

SECTION 2: FUNCTIONS/ PROCESSING ACTIVITIES		
1.	Reason for processing activity	The monitoring & surveillance of CCTV.
2.	Description of function/ processing activity	<ul style="list-style-type: none"> Monitoring & surveillance of CCTV CCTV recording for the prevention, investigation and detection of crime and for safeguarding purposes To secure the perimeter of the school property and offer pupils and staff better security
3.	Is data processed fully by automated means?	No
4.	If processed by automated means, are decisions being made that would have a significant effect on individuals being made as a result of the automated processing?	N/A

SECTION 3: LAWFUL BASIS FOR PROCESSING PERSONAL INFORMATION		
1.	Do you process personal identifiable information?	Yes
2.	What classes of personal identifiable information do you process? (list all that apply)	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
3.	What are the lawful bases for processing personal identifiable information (which Article 6 condition applies)?	Legitimate Interest Choose an item. Choose an item. Choose an item.
4.	Lawful bases (Article 6) supporting information:	To process data for the prevention, investigation and detection of crime and for safeguarding purposes

SECTION 4: LAWFUL BASIS FOR PROCESSING 'SPECIAL CATEGORY' PERSONAL INFORMATION		
1.	Do you process special categories of personal identifiable information?	Yes
2.	Which special category data do you process?	CCTV could possibly capture most special category data items (unintentionally) but the following are more likely for schools Race Health Religion Choose an item. Choose an item. Choose an item.

3.	What are the lawful bases for processing special category information (which Article 9 condition applies)? Public Interest Choose an item. Choose an item. Choose an item.
4.	Lawful bases (Article 9) supporting information: This information isn't intentionally processed, it would only be captured via the CCTV imagery

SECTION 5: RECIPIENTS OF DATA / DATA SHARING						
		Share 1	Share 2	Share 3	Share 4	Share 5
1.	Recipients of data/ data sharing (i.e. name of organisation)	Police	Courts/ Solicitors	Insurance firms	LA	
2.	Why do you share this information?	For the prevention, investigation and detection of crime	To assist with any legal proceedings or rights	To assist with any insurance claims	To assist with any enquiries.	
3.	What classes of personal identifiable information do you share? (list all that apply)	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
4.	What are the lawful bases for sharing personal identifiable information (which Article 6 condition applies)?	Legal obligation Choose an item. Choose an item.	Legal obligation Choose an item. Choose an item.	Legal obligation Choose an item. Choose an item.	Vital interest Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.
5.	Please provide further details to support the Article 6 condition (if different to Section 3 Q3)	DPA 2018 Schedule 2 paragraph 2: https://www.legislation.gov.uk/ukpga/2018/12/pdfs/ukpga_20180012_en.pdf	DPA 2018 Schedule 2 paragraph 5: https://www.legislation.gov.uk/ukpga/2018/12/pdfs/ukpga_20180012_en.pdf			
6.	Is 'special category data' shared? If so, please state what categories.	Race Health Religion Choose an item. Choose an item.	Race Health Religion Choose an item. Choose an item.	Race Health Religion Choose an item. Choose an item.	Race Health Religion Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.

Commented [DK1]: Footage for insurance purposes would go through a Subject Access Request. So would there be a lawful basis for this?

SECTION 7: 3 rd PARTY DATA PROCESSING (e.g. commissioned service)						
		Processor 1	Processor 2	Processor 3	Processor 4	Processor 5
1.	Provide name of the 3 rd party processor	ENTER NAME OF CCTV PROVIDER				
2.	Please state the purpose for which this 3 rd party processor is used	Maintenance / Support of CCTV System				
3.	What classes of personal identifiable information are processed by the 3 rd party processor? (list all that apply)	Personal details Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
4.	What are the lawful bases for the 3 rd party processing personal identifiable information (which Article 6 condition applies)?	Legitimate Interest Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.
5.	Please provide further details to support the Article 6 condition (if different to Section 3 Q3)					
6.	Is 'special category data' processed by the 3 rd party processor? If so, please state what categories.	Race Health Religion Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item. Choose an item. Choose an item.
7.	What are the lawful bases for sharing special category information (which Article 9 condition applies)?	Public Interest Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.	Choose an item. Choose an item. Choose an item.
8.	Please provide further details to support the Article 9 condition (if different to Section 4 Q3)					
9.	In the case of system suppliers, does the 3 rd party host the data?	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.

10.	<i>If yes to Q3, is the hosted data processed outside of the EU?</i>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
11.	<i>Please state in which country the hosted data is processed.</i>					
12.	<i>Do you have a contract/ agreement with this 3rd party processor?</i>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.
13.	<i>If so, please provide details.</i>					
14.	<i>Please state your data protection relationship with this 3rd party processor.</i>	Choose an item.	Choose an item.	Choose an item.	Choose an item.	Choose an item.

SECTION 8: DATA PROTECTION IMPACT ASSESSMENT (DPIA)	
1.	DPIA required? No (if yes please give details)

SECTION 9: RETENTION	
1.	<p>Do you have a retention schedule in place that specifies how long the data in relation to this function/ processing activity is retained for? Yes (if yes please give details)</p> <p>The DPA does not prescribe any specific minimum or maximum retention periods which apply to all systems or footage. Rather, retention should reflect the organisation's purposes for recording information. The retention period should be informed by the purpose for which the information is collected and how long it is needed to achieve this purpose. It should not be kept for longer than is necessary, and should be the shortest period necessary to serve your own purpose. This should not be determined simply by the storage capacity of a system.</p> <p>RCT Council apply a 31 day (1 calendar month) retention period to their CCTV systems.</p>

Commented [LS(M2)]: See suggested wording in School's CCTV Privacy Notice

SECTION 10: PRIVACY NOTICE	
1.	<p>Do you have a privacy notice for this function / processing activity? Choose an item.</p>

SECTION 11: INFORMATION RIGHTS							
Please indicate which information rights apply to this function / processing activity based on the Article 6 legal basis indicated in Section 3 Q2							
Lawful Basis article 6	Right to Access	Right to Rectification	Right to Erasure	Right to Restrict processing	Right to Portability	Right to Object	Auto-decision making
Consent	Yes	Yes	Yes	Yes	Yes	No - but right to withdraw consent	No - but right to withdraw consent
Contract	Yes	Yes	Yes	Yes	Yes	No	No
Legal obligation	Yes	Yes	No	No	No	No	No
Vital interest	Yes	Yes	Yes	No	No	No	Yes
Public Task	Yes	Yes	No	No	No	Yes	Yes
Legitimate Interest	Yes	Yes	Yes	Yes	No	Yes	Yes

SECTION 12: PAPER RECORDS	
1.	<p>Do you store data relating to this function/ processing activity in paper format? No</p>
2.	<p>Are these records live, historical or both? Choose an item.</p>

3.	General location of paper records
4.	Specific location of paper records
5.	Are any of the paper files taken off site? <small>Choose an item.</small>
6.	If so please give details:

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