CCTV Example Resources: Checklist, Logs and Data Protection Impact Assessment (DPIA)

DATA PROTECTION CHECKLIST FOR CCTV INSTALLATIONS

Area	Notes/Comments
1. Initial Assessment	
Have you:	
• Determined who is legally responsible for the installation?	The school governing board/headteacher
• Assessed the purpose of the installation? Is it the most appropriate way to fulfil the purpose?	Security of site
• Determined who is responsible for continuing compliance with data protection?	DPOand SBM
• Assessed whether existing installations still fulfil their intended purpose: are additional cameras needed; should any of the cameras be re-sited?	Yes
2. Signage	
• Are all areas covered by CCTV surveillance clearly signed?	Yes
Do the signs:	
• Clearly indicate that you are entering an area covered by CCTV surveillance?	Yes
• Clearly state the purpose of the installation?	Yes
• Clearly identify the data controller and provide contact details?	No?
3. Image Quality	
• Have you checked whether the quality of the image captured is suitable for the stated purpose?	Yes
• Do you check the quality of the images on a regular basis for clarity of image and for accuracy of any dates/times recorded on the images?	Yes annual maintenance from Oak Park Alarms
• Have you checked whether the camera could be re-sited to provide a better image?	Yes
• Is the installation properly maintained?	Yes as above
• Who is responsible for ensuring maintenance is carried out?	Oakpark Alarms
• Is a maintenance log kept?	Site reports are emailed and filed in folder

Area		Notes/Comments
4.	**Image Management and Security**	
•	Have you defined a period of retention for images, and is this clearly signposted to data subjects?	In the CCTV Policy
•	Is security of the images and recording equipment adequate?	Yes
•	Are procedures in place to ensure that images and recording equipment can only be accessed by authorised personnel?	Yes password protected
•	Have you ensured that monitoring equipment is not on public view?	Yes – SBM office
•	Are procedures in place to record viewing of images i.e. a log?	?
5.	**Compliance with Subject Access Requests**	
•	Has a member of staff been designated to deal with subject access requests, and are all staff aware of the identity of the designated person?	?
•	Are procedures in place to record compliance with the subject access requests i.e. a log?	Yes
•	Where a copy of the data is required has a method been identified for this purpose?	Yes
•	Are facilities available to allow the subject to view images where requested?	Yes
•	Where disclosure to the individual may include images identifying of third parties, has an editing facility been identified to ensure that those images can be disguised?	?
6.	**Access to and Disclosure of Images to Third Parties**	
•	Have you determined whether access being sought in pursuit of the stated purpose for the installation?	Yes normally police only
•	Are procedures in place to record details of access granted i.e. a log?	
•	Has an editing facility been identified to ensure that images of other individuals are disguised where required?	
7.	**Monitoring Compliance**	
Is there a complaints procedure to be followed in respect of:		
•	Use of the system?	
•	Non-compliance with the CCTV guidance issued by the ICO?	

CCTV LOG – VIEWING OF IMAGES

Camera Area(s)	Date/Time of Images	Date Viewed	Name(s) of viewer(s)	Purpose of Viewing	Actions taken

CCTV LOG – REQUESTS FOR DATA BY THIRD PARTIES OR BY SUBJECT ACCESS REQUEST (SAR)

Date	Details of individual requesting access	Details of images required (date, time, location)	Date required by	Access authorised / denied and date	Actions taken (as per CCTV and SAR policies)