

Data Protection Impact Assessment

STEP 1: Identify the need for a Data Impact Assessment

Explain broadly, what the project aims to achieve and what type of processing it involves. You may find it helpful to refer or link to other documents, such as the project proposition. Summarise why you identified the need for a DPIA.

Coundon Court (the School) are considering installing a CCTV system. The new CCTV system will provide enhanced site security and improved safeguarding for the School community.

The legal basis for processing personal data captured by the CCTV is under Article 6(1)(e) GDPR: “processing is necessary for the performance of a task carried out in the public interest”.

In the unlikely event that any Special Category data is captured on CCTV the processing will be under the additional safeguard at Article 9(2)(g) GDPR: “processing **is necessary for reasons of substantial public interest**, on the basis of Union or Member State law which shall be proportionate to the aim pursued, respect the essence of the right to data protection and provide for suitable and specific measures to safeguard the fundamental rights and the interests of the data subject”.

CCTV surveillance will help to:

- protect the School buildings and School assets, both during and after School hours;
- secure the health and safety of staff, pupils and visitors;
- safeguard students absent from lessons through visible checks about location during the School day and also during “free” time;
- prevent bullying and other anti-social behaviours;
- reduce the incidence of vandalism, anti-social behaviour and site incursion;
- assist senior staff and appropriate external agencies in identifying persons who have or who are likely to have committed a breach of the academy rules or a criminal offence.

The need for a DPIA is identified, as this is a project for large scale monitoring (178 cameras for approximately 1700 pupils/200 staff members and numerous visitors – compelling individuals to provide their data.

See appendix 1 Original brief of project from AY17/18

See appendix 2 Camera locations

See appendix 3 Consultation invitation

STEP 2: Describe the processing

Describe the nature of the processing: how will you collect, use, store and delete data? What is the source of the data? Will you be sharing data with anyone? You might find it useful to refer to a flow diagram or another way of describing data flows. What types of processing identified as likely high risk are involved?

CCTV images (digital recordings) go from a camera to a Network Video Recorder unit – a data store. There will be 5 NVR's on site, located in secure offices at the PAC, SFC, Old House, Design Technology and South Block. The system has been designed to allow redundancy so if one of NVRs failed the others would be able to take the loading on the system. There is also 5 NVR sites to allow better flow of network traffic around system.

The Site Manager, Network Manager and Headteacher will be the only people to have direct access to the system for monitoring and reviewing any footage.

We will only share data with:

- The police – where the images recorded would assist in a specific criminal inquiry
- Prosecution agencies – such as the Crown Prosecution Service (CPS)
- Relevant legal representatives – such as lawyers and barristers where legal advice is sought
- Persons recorded and whose images are retained where disclosure is required by virtue of Data Protection Legislation and the Freedom of Information Act 2000.

Staff with a pastoral or safeguarding responsibility who need to understand the nature of an incident and a need to identify those involved as part of a formal academy investigation. Parents and students where it is required to demonstrate that academy policies have been breached and the evidence is required to substantiate oral and written records. Faces of other people will be digitized out (ie anonymised) where required to only show the individual student concerned.

Data will be deleted after every 30 days except where data has been extracted for internal investigations. All retained data will be stored securely and permanently deleted as required by our data retention schedule. Recorded data is kept secure on the School network in drives allocated to the Network Manager, Site Manager or Headteacher. This is to ensure their evidential value and to protect the rights of the people whose images have been recorded.

Data being used for an investigation will be stored on encrypted storage device until the investigation is completed then they will be promptly deleted, unless data retention requirements state otherwise i.e. for a serious incident which may require 25 years retention.

Describe the scope of the processing: what is the nature of the data, and does it include special category or criminal offence data? How much data will you be collecting and using? How often? How long will you keep it? How many individuals are affected? What geographical area does it cover?

The CCTV system will capture visual images only with no audio recording to ensure the minimum intrusion of privacy.

The cameras will be site wide, covering all external and internal areas of the School. High value teaching spaces will also have cameras installed. This is primarily our ICT suites and Design Technology classrooms. Standard classrooms will not have CCTV installed. Cameras will also be sited in pupil toilets to monitor public areas, hand wash areas and the entrance and exit of each toilet. Appendix 2 shows the camera locations.

The likelihood of Special Category data being captured is very low. The data is low sensitivity in all areas bar the public areas of toilets. The toilet cameras are necessary to manage vandalism, bullying and other forms of anti-social behaviour. However, we only need to record images of student going in and out of the main toilet doors and public areas where students may congregate. Urinals and cubicles are not subject to intrusive monitoring. Where necessary sensitive areas within the camera view will be digitized out whilst live recording in the unlikely event that Special Category data is captured.

A high proportion of the School population will be subject to some level of data processing including parents, staff, pupils and visitors. Staff and pupils (numbering approximately 1900 people) will be subject to a high level of exposure due to high mobility levels within the site. Visitors will mainly be exposed from the Car Park to Reception and occasionally elsewhere

as their reason for being on site dictates. For most visitors, parents and external support agencies, our main meeting room is adjacent to Reception. This significantly reduces visitor exposure.

Remote access to the system is only permissible for the Site Manager (by logging into his computer remotely using his secure School network login and password) in response to incidents as directed by the local authority "out of hours" service. For example if there is an alarm activation and confirmed break in the Site Manager would be notified and he would access the system to establish what has happened. This will allow for a risk assessment of site staff accessing the site and information gathering to inform Police action. All other access to the system will be undertaken on site. The out of hours alarm monitoring Centre have no access to the School network or CCTV system.

The system will record by "motion" activation and will be set to record 24 hours a day and seven days a week. Staff, students, and the building require constant monitoring in the daytime. It will operate when the School is closed due to the large and complex nature of the School site and the need to protect the Schools high value assets. The site and its building is very secluded, can be accessed from all aspects and valuable areas are dispersed across the site. This requires full and constant monitoring.

No one area is more at risk than another is. Full and constant monitoring will also secure robust evidence of incursion. Should we have to deal with an intrusion that threatens the safety of our staff and students full surveillance will assist in locating and identifying the intruder(s) and allow for a risk assessment for crisis management. Should a student go missing then full site coverage will allow for accurate tracking of movement and assist in early location.

Describe the context of the processing: what is the nature of your relationship with the individuals? How much control will they have? Would they expect you to use their data in this way? Do they include children or other vulnerable groups? Are there prior concerns over this type of processing or security flaws? Is it novel in any way? What is the current state of technology in this area? Are there any current issues of public concern that you should factor in? Are you signed up to any approved code of conduct or certification scheme (once any have been approved)?

The system will record all of our staff, pupils and visitors whilst on the School site.

Staff, pupils and visitors will have no control over this data system. The School acts as "in loco parentis" for our students and CCTV will assist in delivering our duty of care. It is an extension of our day-to-day physical supervision of all spaces within the School whilst students are present. A CCTV policy regulates the systems use.

Individuals visiting the site will be aware of the CCTV presence and scope of activity. They will know to expect data processing through CCTV and their presence on this site will be based on informed consent. All visitors receive a welcome leaflet to Coundon Court and this will make the nature of our data processing transparent. The academy has a privacy notice displayed in reception and on the School website. Signage will indicate the presence of CCTV at key point around the site. Site users will have routine opportunity to be reminded that the CCTV system is in place.

The School has an existing analogue CCTV system, which is outdated and in need of replacement with modern robust and secure technology. The new system will make all on the site significantly safer. It is reasonable to assume that most visitors are area aware that the academy uses CCTV. This is not a novel application of monitoring, as many schools use CCTV to promote health and safety and appropriate safeguarding measures.

Our network has undergone extensive re-cabling and configuration works and is a secure network. Our cameras will be cabled and not wireless to prevent any potential hack to our system. Our BYOD network still requires staff to use their network login and password on their BYOD device.

Parents and students have been informed of this development through a formal consultation that ran from 24th September through to 1st October 2018. No concern was raised. Students were informed in July 2018 as part of wider information sharing about site improvements. Only one parent contacted the School to express concern about CCTV in the toilet areas. The parent was contacted and no further complaint was made. Two Year 10 students have spoken to me directly about their concerns but understood the reasoning behind the decision.

The academy has given due regard to the ICO Code of Practice for CCTV use.

Describe the purposes of the processing: what do you want to achieve? What is the intended effect on individuals? What are the benefits of the processing for you, and more broadly?

Coundon Court is a large and complex site. It also have a very high student population of over 1650 young people plus up to two hundred employees. We routinely have tens of visitors a day to the site.

The CCTV system will primarily protect the School buildings and School assets, both during and after School hours. It will also secure the health and safety and Safeguarding of both staff, students and visitors.

The academy has a prime duty of care towards its community and CCTV will;

- protect the School buildings and School assets, both during and after School hours;
- securing the health and safety of staff, pupils and visitors;
- Safeguard students absent from lessons through visible checks about location during the School day and also during “free” time;
- prevent bullying and other anti-social behaviours that make students insecure and that require private space to flourish;
- reduce the incidence of vandalism, anti-social behaviour and site incursion;
- assist senior staff and appropriate external agencies in identifying persons who have or who are likely to have committed a breach of the academy rules or a criminal offence.

Indirectly, it will also allow for more efficient tracking and monitoring of student behaviours where concerns exist. It will enable a faster and more effective resolution to incidents. This will enable greater parent and student confidence in our ability to maintain a safe and secure environment.

It will also create significant cost savings, as vandalism to private areas will be significantly reduced. Students will also have the nuisance of closed toilets or restricted access to certain areas removed.

We have worked hard to secure a positive ethos within the School community over the last four years. Standard practices such as a clear and tightly managed Behaviour Policy, Report Cards, Detentions, Assemblies and routine contact with parents have all been deployed. We have even directly invoiced parents for damage to the site where a student has been identified. However, a significant minority of disaffected students continue to damage the site

on a routine basis or behave in a dangerous and threatening manner. Toilets are particularly vulnerable to these behaviours as they are a very private space. Toilets are also the one area of the School that is impossible for staff to routinely supervise in a direct manner.

All within the School community have a right to clean and uninterrupted use of toilet facilities and to feel safe when using them. The behavior of a small minority require such high level monitoring to ensure this is the case.

STEP 3: Consultation Process

Consider how to consult with relevant stakeholders: describe when and how you will seek individuals' views – or justify why it's not appropriate to do so. Who else do you need to involve within your organisation? Do you need to ask your processors to assist? Do you plan to consult information security experts, or any other experts?

Parents and students were informed of the decision to install a new CCTV system through a formal consultation. See Appendix 3. This ran from 24th September through to 1st October 2018. Students have specifically been informed of the nature of coverage in toilets to ensure they feel safe and secure with the CCTV coverage.

Wider consultation i.e. with neighbours has not taken place, as no cameras will be recording outside of the School boundary.

The School's CCTV system is controlled and accessed completely by Coundon Court. Maintenance to the cameras are under warranty, however this does not provide the suppliers with access to any personal information that is recorded or monitored.

The project was subject to a formal tendering process and only approved and suitably qualified, experienced firms were invited to apply. The Governing Body were involved in the decision making process.

STEP 4: Assess Necessity and Proportionality

Describe compliance and proportionality measures, in particular: what is your lawful basis for processing? Does the processing actually achieve your purpose? Is there another way to achieve the same outcome? How will you prevent function creep? How will you ensure data quality and data minimisation? What information will you give individuals? How will you help to support their rights? What measures do you take to ensure processors comply? How do you safeguard any international transfers?

The lawful basis for processing is a public task duty for the safeguarding of children and general health and safety around the School.

The system will achieve its purpose by providing video data of any incident requiring investigation around the School site and act as a general deterrent. With such a large and complex site and a much larger than average student population, CCTV is a cost effective and efficient way to monitor site activity. It would not be practical or affordable to increase staffing levels to provide physical supervision of all the areas required. In addition, this could not be managed during the holiday periods and at nighttime.

There will be signage, a privacy notice displayed at reception, information in our visitor leaflet and The CCTV policy is available on our website.

The cameras in the toilet areas are to be used to act a deterrent and stop vandalism issues. The cameras will only cover the washbasins and entrances to the toilets. Cubicles and urinals are not within camera scope or images digitized out. The School carries out a manual toilet check after each break and lunch for general cleanliness and vandalism but the cameras will help pinpoint who did what and save a considerable trail of pinpointing toilet through statement-based investigation.

There will be no international transfers of data or external processors.

STEP 5: Identify and Assess Risks

Describe the source of risk and nature of potential impact on individuals. Include associated compliance and corporate risks as necessary.	Likelihood of Harm	Severity of Harm	Overall risk
Hacking	Remote	Significant / Severe	Low
Unauthorised disclosure	Remote	Significant/severe	Medium
Unjustified invasion of privacy- Article 8 rights/ right to privacy	Possible/Probable	Significant	Medium/high
Loss of recorded data Covert Monitoring	Remote Probable	Significant/severe	Low/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.				
Risk	Options to reduce or eliminate risk	Effect on risk	Residual risk	Measure Approved
Hacking	All cameras to be hard cabled and system will require password to be entered to be accessible	Reduced	Low	Yes
Unauthorised disclosure	Internal guidance will be provided in the form of a CCTV policy. Privacy notices and signage will allow individuals to be informed of CCTV usage. No audio recording. Limited access to recordings. Retention is 30 days in the usual course of events. Only the Site Manager, Network Manager and Headteacher will have access to the system and all viewings will be logged. We will only share data with: The police – where the images recorded would assist in a specific criminal inquiry Prosecution agencies – such as the Crown Prosecution Service (CPS)	Reduced	Low	Yes

	<p>Relevant legal representatives – such as lawyers and barristers where legal advice is sought</p> <p>Persons who have been recorded and whose images have been retained where disclosure is required by virtue of data protection legislation and the Freedom of Information Act 2000</p> <p>Staff with appropriate responsibility for completing formal investigations into serious breach of School rules.</p>			
Unjustified invasion of privacy	Cameras in toilets will only be able to public areas - record/monitor entrances and wash basin areas where a teacher might reasonably be present. Where video is being captured, faces can be blurred out that are not part of any incident. Cubicles and urinals are not monitored. Parents /pupils have been informed via the formal consultation process outlined above.	Accepted	Medium	Yes
Loss of recorded data	No data will leave the School site and will sit on five password protected NVR's on as secondary network not on the main School network using the spare fibre capacity on system.	Accepted	Low	Yes
Undisclosed monitoring	There will be no undisclosed or covert monitoring taking place on the site. Privacy notices and signage will be public facing to promote the right to be informed.	Eliminated	Low	Yes

STEP 7: Sign off and record outcomes

Item	Name/Date	Notes
Measures approved by:	Andrew Clay Headteacher 7 9 18	Integrate actions back into project plan, with date and responsibility for completion
Residual risks approved by:	Chair of Finance and Premises subcommittee (Governor)	If accepting any residual high risk, consult the ICO before going ahead DPO advice provided
DPO Advice provided	05.10.2018	DPO should advise on compliance, step 6 measures and whether processing can proceed
<p>DPO Advice:</p> <p>CCTV is not a novel application in schools, although the volume and situation of the cameras creates risks. After reviewing the DPIA, there are several factors to consider:</p> <p>Hacking- the risk of hacking into the CCTV system has been reduced by the design of the technology. The School will not retain data for a long period of time. The system has password protected access and the cameras are hard-cabled. The impact of hacking is unknown, although it will depend on a case by case basis. The School has adequately considered and reduced this risk.</p> <p>Unauthorised disclosure- the School have stringent measures in place; password protected access, a CCTV policy, small retention periods, encrypting downloaded personal data, security measures around data stores, limiting the geographical scope of the recordings to the School, not audio recording and limiting access to the office where the monitors are to be displayed, including that of remote access.</p> <p>The CCTV Policy will aid the appropriate safeguards around monitoring, accessing, disclosing and storing CCTV. The School has confirmed that security measures will be in place in regards to downloaded personal data for investigatory purposes, such as the prevention and detection of crime. The School's site manager and colleagues with access to CCTV monitoring should ensure that they have sight of the CCTV policy which mentions remote viewing specifically, alongside GDPR training. Those using the CCTV infrastructure should have relevant training where appropriate and also have sight of the CCTV policy before using the system. This reduces the 'high risk' that recording on a large scale and of 'vulnerable subjects' poses.</p>		

The School should consider what will occur in the event that the Site Manager is absent/ill or unable to utilise access to remote working. If the responsibility is passed to someone else, it should be documented how that employee has been trained/informed in appropriately using the system with GDPR compliance.

Adequate and relevant training regarding GDPR and CCTV must take place when a new employee with access to CCTV begins. These employees should have regard to the ICO's CCTV guidance.

Maintenance to the cameras does not include access to personal data, therefore mitigating the risks of a breach via a processor and eliminating the need for an Article 28 (GDPR) compliant contract.

Unjustified invasion of privacy- There has been sufficient documentation to indicate mitigation of the risks to invading privacy in regards to the CCTV recordings in pupil toilets. However, the type of data subjects (children) and the events at a Dudley school in July 2018 furthers the thought that this DPIA should be taken to the ICO for consideration. This is surrounding the concern that pupils using the toilets will have a reasonable expectation of privacy in such areas; although the recordings are limited to less intrusive areas such as the washbasins and outside the cubical/urinal areas. There is an understanding that this has been implemented to reduce vandalism and bullying. In areas where people have a heightened expectation of privacy, cameras should only be used in the most exceptional circumstances where it is necessary to deal with very serious concerns. However, the School has documented tried and tested measures previously exhausted to indicate reasons as to why CCTV is a proportionate measure to the aim. The cameras in the PE block must **not** record inside the building where pupils can be viewed changing. If this is the case, the DPIA must be revised and discussed with the DPO.

Furthermore, the School has documented that alternative methods of achieving the aim, such as increased staffing, has been deemed impractical. Coundon Court have taken the appropriate stance of consulting parents and pupils prior to the implementation of the CCTV system as documented above. In a verbal discussion, the School indicated that staff members did physical checks in the toilets but this provided no real deterrent for vandalism and bullying. It may be that in areas such as the toilets, recordings should be viewed **ONLY** after an incident has occurred. If this is not appropriate, the School should document that the recommendation has been considered but why it is not appropriate.

Loss of recorded data- the School must have regard to the possibility of data loss. The School have suggested that no CCTV recordings will leave the School site and will be protected on the main School network. Downloaded CCTV data onto e.g. a portable device will be encrypted and this must be stored securely, preferable in a lockable location. Data loss in terms of a failure of an NVR unit has been mitigated by ensuring there are multiple units active and these have the ability to take on the loading system, thus reducing the risk of a loss of data.

Undisclosed monitoring- signage must be adequate and well-informed. All individuals subject to CCTV monitoring must be notified. This should be done prior to processing their data (i.e. placing signage on the Schools gates) and on the School's privacy notices. The record

retention schedule must be updated to reflect any changes in the new system. There will be no covert monitoring. Staff/parents/visitors/pupils each have their own privacy notice. The latter 3 notices *must* be public facing and publication on the School website is strongly advised.

Necessity and proportionality- the high volume of cameras and, ultimately, personal data that will be processed poses a risk to the rights and freedoms of individuals. The School must document their detailed reasoning for the quantity of security cameras used as 178 cameras seems 'excessive' and 'disproportionate'. They must be able to document the reasons for its necessity, balancing between individuals' rights and the School's documented purposes. Previously, the CCTV system included 16 cameras and this was not enough to achieve the purpose of protecting the School sight, its assets and the health and safety of those on the School site. The School has indicated they are satisfied that the new number of cameras is proportionate to the aim. The School have not considered reducing the amount of cameras that are in action, which currently works out as approximately 1 camera per 10 individuals. The School should consider reducing the amount of recording time that takes place if they are not willing to reduce the number of cameras, ensuring that they are recording what is necessary to achieve the aim and not beyond this e.g. having motion cameras for those in the toilet rather than 24/7 monitoring.

Coundon Court have limited the geographical scope to that of the School site and placed protections around viewing the monitors remotely. There are some risks that have not been mitigated, such as the volume of data being collected, however the School has documented its reasoning above, outlining that the retention period of the personal data is minimal and this may help to combat the 'excessive' aspect of the infrastructure. A reduction in the number of cameras and volume of recording is advised.

The consultation - took place on the 24th-1st October and was a positive move for the School and the results indicate that parents and pupils are understanding of the School's aims as the proportionality of monitoring the students was barely questioned. The letter sent to parents regarding the consultation provided adequate information such as the positioning of the cameras in the toilets, however parents and pupils were not provided with information about the number of cameras, which would indicate the volume of personal data being collected. It is safe to assume that parents could contact the School in alternative ways rather than email e.g. via phone call. This letter should have been sent to parents in the normal way of contacting them. Going forward, the School should include the DPO when considering a consultation to ensure that subjects are provided with as much information as possible to confirm they have been well informed. This consultation has allowed Coundon Court to notify parents of the change, the privacy notice includes CCTV and the School also plans to apply new notices around the School site to promote the right to be informed. The right to access is dealt with in the school's SAR template- which is strongly advised to be placed as a public facing document on the Website. The School's CCTV policy, once adopted by the governing body, should also be placed as a public facing document to promote the principle of 'transparency'.

The School has shown 'compliance' through the documentation of this DPIA and the content within. The School has also informed parents of this DPIA. Publication of the DPIA would foster trust by providing further transparency to parents if publicized on the School website, even if in part.

It should be documented that the CCTV will not be used to monitor staff members on site for any other reasons not documented in this DPIA, unless it has been embedded in the contracts of staff members or policies of the School, all of which staff have sight of. If all purposes of the CCTV have not been stated in the DPIA and the lawful basis identified, this should be revised.

The CCTV policy must be amended and implemented prior to turning the cameras on for recording. Coundon Court must involve the DPO in the initial discussions, prior to buying in new technologies and prior to the consultation for the purposes of the DPIA. This will allow for detailed advice and guidance on the possible issues that could arise and will shape a 'privacy by design' approach.

All staff must receive up to date training around Data Protection / GDPR and this is something the School must action as soon as possible. Without the relevant training, the School may not have the level of understanding required to prevent a risk to the rights and freedoms of individuals which puts them at a higher risk of a breach.

The School should also document how they anticipate 'digitizing' out sensitive areas which are subject to live viewing, as suggested in Appendix 3.

This v2 will be saved as the final DPIA for Coundon Court regarding the CCTV infrastructure. V1 is a separate document and is not the fully-informed DPIA.

Disclosures of any video recordings must be documented and processed following the CCTV policy.

The DPO would like to forward the completed and fully informed DPIA to the ICO for consideration, taking into account the potential risk of filming vulnerable subjects where privacy would be a reasonable expectation. The potential for 'high risk' has been mitigated via the notice, consultation, security measures and position of the cameras, however advice and guidance from the regulatory authority could provide confirmation that the risk has been effectively mitigated as far as is possible. This would not be a mandatory submission to the ICO. Should the School disagree to this advice, their reasons should be documented below.

Overall, processing can proceed but the School must consider that the volume and positioning of the cameras create a greater risk to the rights and freedoms of individuals.

DPO Advice accepted or overruled by:		If overruled explain your reasons below.
Comments:		

Consultation responses reviewed by:	N/A	If your decision departs from individuals' views, you must explain your reasons
Comments:		
This DPIA will be kept under review by:	Headteacher and F&P subcommittee annually	

Appendix 1

Coundon Court Academy

CCTV Project

2017 - 18



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2. Document Control

Version	Release	Date	Comments	Distribution
1.0	Draft			I Khalifa
1.1	Draft			I Khalifa P O'Brien
1.2	Draft			I Khalifa P O'Brien A Clay
1.3	Final			Suppliers

3. Purpose

The purpose of this document is to:

- Outline the current state of the Coundon Court CCTV Infrastructure
- Define the project goals
- Specify the project deliverables

4. Introduction

Coundon Court are in the process of refreshing the CCTV Infrastructure

This document outlines the following:

- Current situation and background – Network infrastructure
- The project objectives and scope
- The project deliverables

5. Current situation and background

Coundon Court currently have a cctv system which has been installed on an adhoc basis with a mixture of internal IP and Analogue External cameras hosted on different systems.

The internal camera system consists of 15 IP Cameras from different manufactures managed via a CCTV software system called Security Monitor Pro , the software is installed on a server hosted on a premise and is licensed for 16 Cameras.

The external camera system consists of 11 cameras which are connected via coax cable, the system is independent of the internal cctv system and records back to a DVR. The main purpose of the external cameras is to record activity at the perimeter of the site including the main entry and exit points.

The Internal cameras are broadcasting on the default vlan across site, however a dedicated cctv vlan is available.

The network was upgraded in 2016 and each block is connected via om4 fibre running at 10gb speed. A 48 port Dell N2048P series switch was installed at each block to cater for CCTV, Voip and Wireless network points. The network has also been configured with Vlans to separate the traffic and provide QOS.

Description	QTY	Notes
Internal cameras	15	Manufactures include D-Link, Axis , Trendnet
External cameras	11	Coax Cable and record back to DVR
POE switches Dell N2048p	7	Interconnected via 10 gb fibre and cctv vlan configured – 30.8 watts power per port
Server	1	Dell Poweredge R210 Intel Xeon CPU E3-1220 16GB Ram 1tb Storage

A number of issues have been identified and need rectifying

Issue	Risk	Notes
Number of Cameras	High	The numbers of cameras installed do not provide coverage to the whole school , corridors , stairs , areas of high footfall and areas where a risk of high value equipment could be vandalized are not sufficiently monitored
Network Traffic	High	Cameras are currently installed on the default vlan network , the network traffic is not segregated and will cause slowdown of the network if additional cameras are added to the system
CCTV Security	High	<p>CCTV needs to be access securely, the traffic can be intercepted if in its current form if appropriate tools were deployed to capture network traffic.</p> <p>A robust system is required to ensure access to the systems is controlled to ensure only delegated personnel have access to the system</p>
Manageability and Maintenance	High	<p>There is no redundancy and contingency plan in place should the CCTV infrastructure develop a fault.</p> <p>The camera system needs to be managed and maintained to ensue value for money and return on investment on a substantial resource.</p>

6. Project objectives

The key Objectives of this project are to:

1. Define purpose and use of CCTV

The need of a new CCTV system has arisen due to the need of the School to monitor areas of the school for the specific purpose of:

- Ensure the health and safety of its students, staff and visitors whilst on the school premises
- To protect and deter misuse of school equipment
- Assist in investigating vandalism

2. Improve the CCTV Provision by

- Conducting a thorough survey of the site to ensure appropriate cameras are installed in the correct locations
- Recommend a comprehensive Kit list
- Ensure installation and management of CCTV project from initiation to delivery

7. Project Deliverables and Scope

Deliverables

- Produce costed option appraisal for the improvements to the CCTV system based on provided site maps (Appendix 1)
- Works to be completed over the February Half term, Easter holidays and 6 weeks summer holiday

Scope

- Conduct a thorough survey of the site to ensure appropriate cameras are installed in the correct locations such as:
 - All Corridors
 - All lobbies / waiting areas
 - All entries and exits to toilets
 - All exits and entrances including corridors, stair cases , external areas, basement stairs, fire exits
 - Reception areas
 - Kitchen / dining Area
 - Each staircase on each floor
 - Lift access
 - Wheel chair areas
 - Car parking zones
- Recommend and Provide a Kit list for all CCTV equipment ensuring
 - Network bandwidth is reduced by installing NVR or NAS devices in each block
 - Software to effectively monitor cameras at multiple locations both onsite and remotely
 - Option for motion detection on all cameras
 - Cameras are capable of providing recordings in both day and night modes
- Labelling – CCTV Cameras to be hard labelled with corresponding patch panel location and number
- Warranty - Certified written warranty including duration of warranty for all equipment and includes testing report for all CCTV cameras and accessories installed
- Software licenses and patch management – All software to be licensed for a minimum 3 year term, upgrades and patches to be applied for the duration of the support contract. Perpetual or subscription based license options will be considered
- Network cabling to be provided as a separate cost
 - All network cabling must be Cat6 category minimum
 - All cameras to be run directly back to existing POE switches
- Project Management - Project manager to be assigned for the duration of the project to manage all material handling, onsite management of engineering team, adherence and production of all Health & Safety and risk assessment statements
- Project handover documentation – All warranties, test documentation, SLA to be handed over to the Academy at the end of the project

- South Block, North Block and Technology areas of the school have ACM materials primarily above ceilings. Please refer to the full asbestos register provided (Appendix 4) for these blocks.
- It is recommended that cable runs are surface mounted in these blocks except where there is clear guidance given in the asbestos register or further information is sought from the Facilities Manager”
- Location – Able to respond quickly and have the ability to provide technical resources and personnel quickly
- Flexibility – The support partners ability to adapt their service to the unique needs of the school, the IT needs of a school are unique and different , staff resourcing , strategy developments and budgetary constraints mean that the IT needs will be quite different 3,6 or 12 months down the line.
- Industry Knowledge – The support partner must have experience of working with educational establishments
- Experience – Demonstrate expert knowledge in the CCTV and Security sector
- Responsiveness – Service Level agreements clearly defined and expectations agreed , evidence of how these are measured would be beneficial
- Accreditations – Evidence of accreditations , membership of regulatory frameworks
- Reference sites – Independent references from existing customers
- Project handover documentation - All warranties, test documentation, SLA to be handed over to the Academy at the end of the project
- Documentation and reporting – Comprehensive documentation for the CCTV system and associated IT infrastructure whilst ensuring security by ensuring an audit trail of user access is provided. Access to Data and Authentication mechanisms MUST be traceable and accountability and responsibility agreed
- Hours of operation – Core business hours support is the preferred option 8 – 5 Mon – Fri
- We are ideally seeking a 36 month contract to include support, training, maintenance and install\reinstall warranty for the equipment, the contract will have an annual review and a break clause would be applied with a 4 weeks’ notice period to terminate after month 12 which incur nil cancellation charges

Appendix 1 – Site Maps and Proposed CCTV Locations

[Please click on map to open PDF](#)



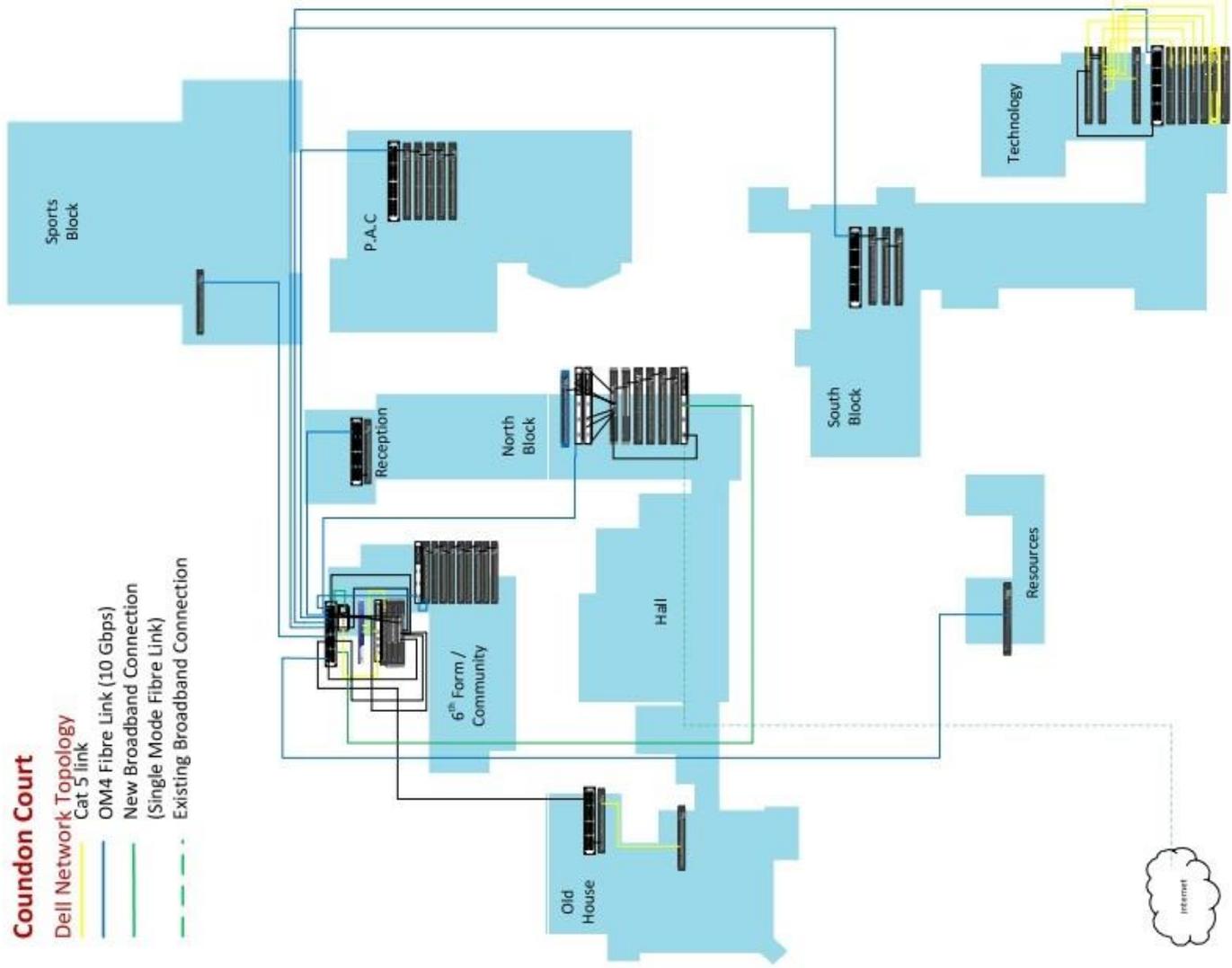
Aerial View of School



Appendix 2
Coundon Court Current Network Topology
[Please click on the diagram to open in Visio](#)

Coundon Court

- Deil Network Topology**
- Cat 5 link
- OM4 Fibre Link (10 Gbps)
- New Broadband Connection (Single Mode Fibre Link)
- Existing Broadband Connection



Coundon Court Switch Details

N4000 Switches Upgraded Dec 2016
Firmware updated Feb 2017

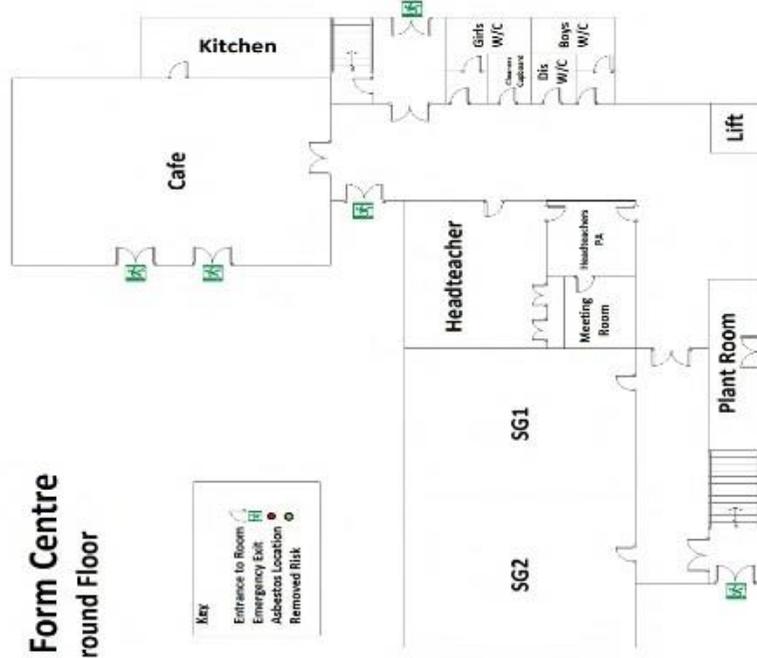
Host Name	Location	Model	Serial Number	Service
CCA-SF-CORE-01	Sixth Form Server Room	N4032F	CN05KGDH2829856F00 80A02	682QX4
CCA-SF-CORE-02	Sixth Form Server Room	N4032F	CN05KGDH2829857F04 03A03	HRRRX4
CCA-SF-CORE-03	Sixth Form Server Room	N4032F	CN0JH9TW2829866K0312A 00	CJR1Y42
CCA-Old-House	Old House	N2048P	CN0H3MDW2829854P 0385A03	DLGS0Z
CCA-English	Technology - Relocated to English	N2048	CN0DMD5F2829859I02 01A04	3JRVX42
CCA-Sixth-Form-STK	Sixth Form	N2048P	CN0H3MDW2829854P 0348A03	GKGS0Z
		N2048	CN0DMD5F2829859I02 66A04	4DRVX4
		N2048	CN0DMD5F2829859I01 97A04	8JRVX42
		N2048	CN0DMD5F2829859I02 93A04	7BRVX4
		N2048	CN0DMD5F2829859I01 15A04	DPRVX4
		N2048	CN0DMD5F2829859I01 46A04	CMRVX4

Appendix 4 – Asbestos Maps and Asbestos Register

Please click on [diagrams to open Maps and Register](#)



Sixth Form Centre Ground Floor



Master Asbestos Map - 07/11/2017

Countdown Court Asbestos Register

North Block

Map Ref	Report No	Type Of Survey	Room / Area	Detail	Comments / Additional Detail
NB1	TZ4513/0513	MS	2nd F, Main Prep Room	Cabinets, cement panel backing to cabinets	Good condition - (Page 32 – TZ4513)
NB2	TZ4513/0513	MS	2nd F, Main Prep Room	Brown floor tiles	Good condition - (Page 30 – TZ4513)
NB3	TZ4513/0513	MS	2nd F, Main Prep Room	Insulating panels around skylight	Covered - (Page 34 – TZ4513)
NB4	TZ4513/0513	MS	2nd F, Main Prep Room	Cement heat pads	Good condition - (Page 33 – TZ4513)
NB5	TZ4513/0513	MS	2nd F, Main Prep Room	Cupboards, cement panel backing to cupboards	Good condition - (Page 32 – TZ4513)
NB6	TZ4513/0513	MS	2nd F, Main Prep Room	Insulating panels around skylight	Covered - (Page 34 – TZ4513)
NB7	TZ4513/0513	MS	2nd F, Main Prep Room	Fume cupboard – cement flue under fume cupboard	Good condition - (Page 35 – TZ4513)
NB8	TZ4513/0513	MS	2nd F, Main Prep Room	Ceiling – cement flue above suspended ceiling	Not accessible - (Page 13 – TZ4513)
NB9	TZ4513/0513	MS	2nd F, Main Prep Room	Brown floor tiles	Good condition - (Page 30 – TZ4513)
NB10	TZ4513/0513	MS	2nd F, Main Prep Room	Flue – cement flue floor level into ceiling	Not accessible - (Page 13 – TZ4513)
NB11	TZ4513/0513	MS	2nd F, Main Prep Room	Skylights insulating panels	Covered - (Page 13 – TZ4513)
NB12	4677	MS	North Block R122	up stand to skylight x 2	Covered - (page 32 54677)
NB13	4677	MS	North Block – Store Room off Biology Room	brown floor tiles	Good condition - (page 33 54677)
NB14	4677	MS	North Block R222	up stand to skylight x 3	Little dent in upright (page 35 54677)
NB15	4677	MS	North Block R221	up stand to skylight x3	programme removal (page 35 54677)
NB16	4677	MS	North Block R221	brown floor tiles	Good condition - (page 36 54677)

Appendix 2
CCTV Master Location

North Block	Notes
Meeting Room	
Reception Waiting Area	
Student Reception	
Door 3 Entrance Lobby	
Library	
Door 2 Ground Floor Girls W/C	
Door 2 Entrance Lobby 1	
Door 2 Entrance Lobby 2	
Door 1 Entrance Lobby	
Crush Hall	
Door 4	External
Bike Shed	External
Door 3 Camera 1	External
Door 3 - Camera 2	External
Door 2	External
Door 1 Staircase First Floor	
Door 2 Staircase First Floor	

Door 3 Staircase First Floor	
Door 3 First Floor Girls W/C	
Door 3 First Floor Corridor	
Door 2 First Floor Landing towards Door 3	
Door 2 First Floor Landing towards Door 1	
Door 1 First Floor Corridor	
Door 1 Staircase Second Floor	
Door 2 Staircase Second Floor	
Door 3 Staircase Second Floor	
Door 3 Second Floor Landing	
Door 2 Second Floor Landing	
Door 1 Second Floor Landing	
South Block	Notes
Door A Front	External
Door A Ground Floor - Camera 1	
Door A Ground Floor - Camera 2	
Door A Male W/C	
Door A Girls W/C	

Canteen - Camera 1	
Canteen - Camera 2	
Canteen - Camera 3	
Canteen - Camera 4	
Canteen - Camera 5	
Canteen - Camera 6	
Canteen - Camera 7	
Door A Rear	External
Canteen 1 (Sports Hall Side)	External
Canteen 2 (Sports Hall Side)	External
Door B Ground Floor W/C	
Door B Ground Floor	

Door B Outside BG2/3	
Door B Ground Floor Male W/C	
Outside BG3	External
Door C Ground Floor Corridor - Camera 1	
Door C Ground Floor Corridor - Camera 2	
Door C Rear	External
Door D Staircase	

Door D First Floor Corridor	
Door A Staircase	
Door A First Floor Corridor Camera 1	
Door A First Floor Corridor Camera 2	
Door B Staircase	
Door B First Floor Landing	
Door B First Floor Corridor (towards B16)	
Door C First Floor Landing	
Door C Staircase	
CG5	External
Technology	Notes
T2 - Camera 1	External
T2 - Camera 2	External
Technology CAM Room	
T4 - Camera 1	
T4 - Camera 2	
T6	
T8 -Camera 1	
T8 -Camera 2	

T8 - Camera 3	External
T8 - Camera 4	External
T11	
T12	
PAC	Notes
Entrance	External
Ground Floor Corridor - Camera 1	
Ground Floor Corridor - Camera 2	
Ground Floor Corridor - Camera 3	
Ground Floor Corridor - Camera 4	
Male W/C	
Female W/C	
Plantroom - Camera 1	External
Plantroom - Camera 2	External
PG3	External
First Floor Landing	
First Floor Fire Escape	
P12	
P13	
Resources	Notes

Resources Corridor	
R3	External
R2	External
PE Workroom - Camera 1	External

PE Workroom - Camera 2	External
R1	External
Cleaner in charge	External
Old House	Notes
Old House Rear Entrance	
Outside OG1	
Ground Floor Lobby	
Ground Floor Entrance Hall	
6th Form Girls W/C	
6th Form Boys W/C	
OG1	External
First Floor Landing	
First Floor First Exit Corridor - Camera 1	
First Floor First Exit Corridor - Camera 2	
First Floor Fire Exit	External
Second Floor Landing	

Second Floor First Exit Corridor - Camera 1	
Second Floor First Exit Corridor - Camera 2	
Second Floor Fire Exit	External
School Hall	Notes
School Hall	External
School Hall - Camera 1	
School Hall - Camera 2	
School Hall - Camera 3	
Business & Computing	Notes
SG1	
SG2	
Ground Floor Corridor - Camera 1	
Ground Floor Corridor - Camera 2	
Ground Floor Corridor - Camera 3	
Ground Floor Corridor - Camera 4	
Staircase 1 Lobby	
Café	
Ground Floor Male W/C	
Ground Floor Female W/C	

Kitchen	External
Ground Floor Male W/C	External
SG2	External
Heads Office	External
Staircase 2 Lobby	
Staircase 2 Lobby	
Staircase 1	
First Floor Corridor - Camera 1	
First Floor Corridor - Camera 2	
First Floor Corridor - Camera 3	
S11	
S12	
S13	
S14	
First Floor Female W/C	

First Floor Male W/C	
Field Changing Rooms	Notes
Male Entrance 1	
Male Entrance 2	

Female Entrance 1	
Female Entrance 2	
PE Block	
Swimming Pool	External
Plant Room	External
PE Corridor - Camera 1	
PE Corridor - Camera 2	
Existing External Poles	Notes
Column Dry Stone Wall - Camera 1	
Column Dry Stone Wall - Camera 2	
Column Dry Stone Wall - Camera 3	
Column Hollyfast Entrance - Camera 1	
Column Hollyfast Entrance - Camera 2	
Column Lawns 1 - Camera 1	
Column Lawns 1 - Camera 2	
Column Lawns 1 - Camera 3	
Column Lawns 2 - Camera 1	
Column Lawns 2 - Camera 2	
Column Lawns 2 - Camera 3	

Column Tennis Courts - Camera 1	
Column Tennis Courts - Camera 2	
Column Tennis Courts - Camera 3	
Column PE Block - Camera 1	
Column PE Block - Camera 2	
Column PE Block - Camera 3	
Column Sliding Gate - Camera 1	
Column Sliding Gate - Camera 2	
Column Sliding Gate - Camera 3	

Appendix 3

Dear Parents

I write to inform you of recent improvements to Coundon Court School. We were able to secure 1.5 million to replace the roofs on North Block and to replace the ageing sash windows in the Old House. The latter project will cost 350K by itself. We are responsible for a Grade 2 listed building and this responsibility has a high price.

We have also refurbished several design technology rooms into “fit for purpose” modern facilities. These rooms allow for students to utilise a range of materials within a single project, as opposed to having separate IT, resistant materials and textiles rooms.

The Library has also been significantly extended and new shelving and stock ordered to make it a vibrant and exciting space. I look forward to students taking advantage of the reading books available. It will also operate as a classroom with a suite of laptops for students to explore and research information.

We have a serious responsibility to ensure that our site is safe at all times. Our CCTV system has been updated to ensure full site coverage of both inside and outside public spaces. Coundon Court is a large and complex site and we believe it is important to be able to monitor what happens at all times. We have conducted a GDPR risk assessment to ensure the data recorded is secure and not disproportionately intrusive.

As well as extensive site coverage, we have installed cameras for use in entrances and public areas of all student toilets. They **do not** monitor and record urinals and cubicles. This is to ensure that vandalism and bullying cannot take place. Students have a right to expect free and safe access to toilet facilities. They also have a right to expect clean and pleasant conditions. Sadly, a small number of disaffected students will damage the toilets and place them beyond use. This is not a day to day issue but when it happens it is costly and a serious inconvenience to students. With so many students, we cannot afford for closed toilets. The CCTV will deter students from causing damage and promote safe spaces.

Toilets are prone to vandalism as they are very private spaces and impossible for staff to supervise directly. Bullying and anti-social behaviour can also be hidden. The CCTV system will enable us to identify and challenge any anti-social behaviour and then deter further problems far more effectively and efficiently than current practice allows. Letters, phone calls and detentions do not prevent such behaviour enough and CCTV will create a concrete and immediate deterrent. It will make the school a safer and more pleasant place for all.

There are some very important issues to manage as we monitor the school in this way:

The cameras only monitor and record public space, the space a teacher could reasonably walk into and observe students. Any possible camera incursion into sensitive areas will be digitised out and not recorded.

Access to recordings is only given to the Headteacher, the Site Manager and in the case of female toilets; it will be a senior, female colleague.

The recordings are stored securely for 30 days and then deleted.

We would only show the recording to a parent if they formally challenged our investigation into an incident that involved their child. Any faces or means of identification, other than that of the student identified as causing the problem, would be digitized out.

We understand the right to privacy under GDPR but believe that we have the balance right in terms of maintaining a safe and secure site for our community. I trust that you will understand this.

For most visitors CCTV monitoring will be limited to the main entrance and reception as we have a new meeting room immediately adjacent to the reception area. At Parents' Evening and Special Events you would be subject to camera recordings around the site. Access to recordings are controlled and data will be routinely deleted as per the above.

There are a large number of cameras around the site but we have a large, open and complex site to manage with over 1650 young people. We have many rooms that contain valuable equipment. The system is designed to keep us safe, to identify any incursion and to allow for effective evidence gathering and a prompt response to any threatening incursion. Such events

are thankfully rare but the CCTV will allow us to risk assess any intervention, gather evidence for external authorities and ensure students are safely managed.

Should you have any questions about the introduction of the system then please contact me through the following email address:

CCTVQueries@coundoncourt.org.

The email address will be open until 1st October 2018.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Andrew Clay', written in a cursive style.

Mr Andrew Clay
Headteacher