



Summary of Data Protection Impact Assessment (DPIA) – CCTV in School Toilets Communal Areas

Overview

Hornsea School and Language College has completed a Data Protection Impact Assessment regarding the installation of CCTV cameras in communal areas of the lower school toilets. Cameras are positioned only in washbasin and entrance spaces; they **do not cover cubicles, urinals, or any private areas**.

Purpose

- Safeguarding students by reducing bullying, smoking, and vaping in toilet areas.
- Ensuring toilets remain safe, clean, and accessible.
- Preventing vandalism, with an estimated annual saving of over £10,000 in repairs.

Consultation and Background

- The Student Council and wider student surveys highlighted ongoing concerns about toilet safety and conditions.
- A number of measures (increased staff patrols, vape detectors, restricted access) were trialled before CCTV was considered.
- CCTV is already in place elsewhere on site and has improved behaviour and wellbeing.

Data Protection Measures

- Data processed: video images of students, staff, and visitors in communal areas.
- Data stored securely on the school's internal server; access is strictly limited to three authorised staff members.
- Access is permitted only in response to a verified incident and is logged for accountability.



- Images are automatically deleted after 14 days unless required as evidence.
- No data is transferred externally or outside the UK.

Safeguards

- Camera positioning is regularly checked to ensure no private areas are captured.
- Clear signage informs users that CCTV is in operation at the entrance to, and inside the areas covered.
- Parents and students were notified before installation.
- Strict technical and organisational controls are in place, including password protection, secure servers, and audit logs.

Risks and Mitigation

- **Privacy concerns** – mitigated through consultation, transparency, signage, and restricted coverage.
- **Data misuse or unauthorised access** – prevented by limiting access, logging all use, and regular audits by the DPO.
- **System failure or technical errors** – reduced through regular maintenance and compliance checks.

Legal Basis for Processing

The processing is necessary for safeguarding, protecting students' health and wellbeing, and carrying out tasks in the public interest.

Review

The DPIA will be reviewed regularly to ensure CCTV use remains appropriate, proportionate, and compliant with data protection law.

DPIA was completed on 16/07/2025.