



Privacy Notice CCTV

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Approval Date	July 2024
Policy Review Date	September 2024

1. Introduction

Under UK data protection law, individuals have a right to be informed about how the HISP Multi Academy Trust uses any personal data that we hold about them. We comply with this right by providing 'privacy notices' (sometimes called 'fair processing notices') to individuals where we are processing their personal data.

This privacy notice has been written to inform members of the public, parents, pupils/students and staff of HISP Multi Academy Trust about how and why we process their personal data in relation to CCTV.

Our trust, the HISP Multi Academy Trust, is the 'data controller' for the purposes of UK data protection law.

Our Trust Data Protection Officer is Kevin Thurlow-Criss (see 'Contact us' below).

2. The personal data we hold

By using CCTV systems, the trust collects, stores and uses static or moving images of individuals located in the surveillance area.

Our surveillance areas include:

- Public entrances
- School corridors
- Grounds within the trust

3. Why we use this data

The trust operates CCTV for the following purposes:

- for safeguarding children,
- for the prevention and detection of crime.

4. Our lawful basis for using this data

Our lawful basis for processing your personal data is Article 6(1)(e) and 6(1)(f) respectively:

- 6(1)(e) - Processing is necessary for the performance of a task carried out in the public interest or in the exercise of official authority vested in the controller – Safeguarding children.
- 6(1)(f) - Processing is necessary for the purposes of legitimate interests - prevention and detection of crime.

5. How we store this data

- Reception – Internal camera system holds data for 6 months and is then overwritten
- Reception – External camera system holds data for 18 days and is then overwritten

- Bungalow – External IP camera system holds data for 14 days and is then overwritten

Recordings may be viewed by the police for the prevention and detection of crime and authorised officers of the Council. A record will be maintained of the release of recordings to the police or other authorised applicants. A register will be available for this purpose.

Viewing of recordings by the police must be recorded in writing and in the log book. Requests by the police can only be actioned under section 29 of the Data Protection Act 1998. Should a recording be required as evidence, a copy may be released to the police under the procedures described in the above paragraph. Recordings will only be released to the police on the clear understanding that the recording remains the property of the school, and both the recording and information contained on it are to be treated in accordance with this code. The school also retains the right to refuse permission for the police to pass to any other person the recording or any part of the information contained thereon. On occasions when a Court requires the release of an original recording, this will be produced from the secure evidence store, complete in its sealed bag.

The police may require the school to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the police.

Applications received from outside bodies (for example solicitors) to view or release recordings will be referred to the Head of School. In these circumstances discs will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a court order.

6. Who we share data with

Your information will only be made available to school/trust employees where there is a need to investigate the recording. Only employees authorised by school/trust management may have access to this footage.

We will only share CCTV footage with other agencies where there is a lawful reason to do so - for example to share with the police for the purposes of crime prevention or to assist in locating an absconding pupil.

7. Your rights

Under GDPR, individuals have the following rights in relation to the processing of their personal data:

- to be informed about how we process your personal data. This notice fulfils this obligation,
- to request access to your personal data that we hold, and be provided with a copy of it,
- to request that your personal data is erased where there is no compelling reason for its continued processing.

To exercise any of these rights, please contact us (see 'Contact us' below).

8. Complaints

We take any complaints about our collection and use of personal information very seriously.

If you think that our collection or use of personal information is unfair, misleading or inappropriate, or have any other concern about our data processing, please raise this with us in the first instance.

Alternatively, you can make a complaint to the Information Commissioner's Office:

- Report a concern online at <https://ico.org.uk/make-a-complaint/>
- Call 0303 123 1113
- Or write to: Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF

9. Contact us

If you have any questions, concerns or would like more information about anything mentioned in this privacy notice, please contact;

- Kevin Thurlow-Criss, Data Protection Officer, HISP Multi Academy Trust, Winchester Road, Chandlers Ford, Hampshire, SO53 2DW. Email: info@hispmat.org