



The Consortium Academy Trust -

CCTV Footage Data Protection Statement

This Data Protection Statement ("**this Statement**") explains our use of CCTV footage, including how such footage will be used, how we determine for how long we keep it and what your related rights are.

1. Who are we?

1.1 We are The Consortium Academy Trust (registered company number 07665828). Our registered office and address for correspondence is at Cottingham High School, Harland Way, Cottingham, East Riding of Yorkshire, England, HU16 5PX. As at 25 May 2018 we operate the following academies: Croxby Primary, Cottingham High, Hessle Academy (Hessle High and Penshurst Primary) and Wolfreton.

1.2 We are committed to ensuring that all personal information we hold is treated properly and in accordance with applicable data protection legislation. We are registered as a data controller with the Information Commissioner's Office and our registration number is ZA359251. In accordance with applicable data protection legislation, we are required to explain to you how we will treat any personal data which we collect about you.

1.3 This Statement applies to anybody who is recorded using any of our CCTV systems. It does not cover any information that you may provide to us or may relate to you other than information contained within CCTV footage recorded using those systems.

1.4 You have the right to lodge a complaint with the Information Commissioner's Office if you have any concerns with regard to the way in which we process your personal information.

2. Our CCTV Systems

2.1 As at 25 May 2018, we operate a CCTV surveillance system at each of the following locations:

- (a) Croxby Primary, Bricknell Avenue, Cottingham, HU5 4TN
- (b) Cottingham High, Harland Way, Cottingham, HU16 5PX
- (c) Hessle High, Heads Lane, Hessle, HU13 0JQ
- (d) Wolfreton, Well Lane, Willerby, HU10 6HB

2.2 Each of our CCTV systems has been installed for, and the information collected using our CCTV systems will be used where necessary for, our legitimate interests in preventing and detecting crime, fraud and disorder and protecting the security, health and safety of our staff, learners, parents, governors and visitors.

2.3 None of our CCTV surveillance systems record audio footage.

- 2.4 Our CCTV policy is available upon request from our Data Protection Officer who can be contacted by email at dpo@consortiumtrust.co.uk or by writing to the Data Protection Officer, The Consortium Academy Trust, c/o Cottingham High School, Harland Way, Cottingham, East Riding of Yorkshire, England, HU16 5PX.
- 2.5 Please note that Penshurst Primary School operates a video entry system at the main gates and the rear door. However, this system does not record any such footage.

3. To whom may we disclose CCTV footage?

We may disclose CCTV footage relating to you:

- 3.1 With third parties who are directly involved in dealing with any request, enquiry, complaint or other correspondence submitted by you which the footage is relevant to;
- 3.2 With third parties who are providing us with professional advice which the footage is relevant to where necessary for our legitimate interests and permitted by law;
- 3.3 Where we are legally required to do so;
- 3.4 In connection with criminal investigations, legal proceedings or prospective legal proceedings which the footage is relevant to where necessary for the related legitimate interests of us or a third party and permitted by law;
- 3.5 In order to establish, exercise or defend our legal rights where necessary for our legitimate interests and permitted by law; and
- 3.6 Where we have stated or informed you otherwise.

4. Your rights

- 4.1 You have a legal right to see a copy of the personal information that we keep about you and to require us to correct any inaccuracies, subject to certain exemptions. In some circumstances you may also have the right to:
 - (a) request that we erase any personal information held about you;
 - (b) restrict our processing of your personal information (for example to ask to suspend the processing of personal information to establish its accuracy or the reasons for processing it);
 - (c) data portability (i.e. to request the transfer of personal information to a third party); and
 - (d) object to our processing of your personal information where we are relying on a legitimate interest (or those of a third party) or the processing is carried out on the basis that it is necessary for the performance of a task in the public interest.

- 4.2 Requests in respect of the above should be made in writing to the Data Protection Officer, The Consortium Academy Trust, c/o Cottingham High School, Harland Way, Cottingham, East Riding of Yorkshire, England, HU16 5PX or via email at dpo@consortiumtrust.co.uk. Please contact the same address if you have any reason to believe that information we hold about you is inaccurate. We will respond to your request as soon as possible and, in any event, within one month from the date of receiving the request. Please note that we may, where legally permitted, reject any such request or limit the scope of our response (e.g. if, in the circumstances, the right does not apply to you).
- 4.3 In accordance with applicable data protection legislation, we follow security procedures in the storage and disclosure of your information. We may therefore request proof of your identity and rights before complying with any request of a nature described in section 4.1 above.
- 4.4 You will not generally have to pay a fee to exercise any of your rights described in section 4.1 above. However, we may charge a reasonable fee if you make a request to see a copy of your personal information which is clearly unfounded or excessive. Alternatively we may refuse to comply with your request in such circumstances.

5. Security and Retention

- 5.1 We have put in place appropriate security measures to prevent personal information (including CCTV footage) from being accidentally lost, used or accessed in an unauthorised way, altered or disclosed. In addition, we limit access to such personal information to those employees, agents, contractors and other third parties who have a valid need to know that information.
- 5.2 We have put in place procedures to deal with any suspected data security breach and will notify you and/or any applicable regulator of a suspected breach where we are legally required to do so.
- 5.3 Footage captured by our CCTV system will be retained by us for up to 30 days from the date of recording and then automatically overwritten. Any footage copied from the system for a purpose described in this Statement will be retained for a reasonable period having regard to the relevant purpose for the footage being copied, following which it will be securely destroyed.
- 5.4 Whilst taking into consideration our legal obligations, we will on an ongoing basis: review the length of time that we retain personal data; consider the purpose or purposes for which we hold the personal data in deciding whether (and for how long) to retain it; securely delete personal data that is no longer needed for such purpose or purposes; and update, archive or securely delete information if it goes out of date.

6. How will you know if we make any changes to this Statement?

- 6.1 This Statement does not form part of any contract.

6.2 We may amend this Statement at any time. If we make any changes to the way in which we use CCTV footage we will post a related update on the homepage of our website (www.consortiumtrust.co.uk).

7. Contact

If you have any questions about this Statement or our use of CCTV footage, please contact our Data Protection Officer by email at dpo@consortiumtrust.co.uk or by writing to the Data Protection Officer, The Consortium Academy Trust, c/o Cottingham High School, Harland Way, Cottingham, East Riding of Yorkshire, England, HU16 5PX.