

Ormiston Academies Trust

Surveillance Systems Privacy Notice

This privacy notice has been written to inform members of the public, parents, pupils and staff of Ormiston Academies Trust (OAT) about how and why we process their personal data in relation to CCTV and e-safety monitoring.

Who are we?

Ormiston Academies Trust is a 'Data Controller' as defined by Article 4 (7) of GDPR. This means that we determine the purposes for which, and the manner in which, your personal data is processed. We have a responsibility to you and your personal data and will only collect and use this in ways which are compliant with data protection legislation.

The Trust has appointed Alexandra Coughlan to be its Data Protection Officer (DPO). The role of the DPO is to ensure that the Trust is compliant with GDPR and to oversee data protection procedures. The contact details are:

dpo@ormistonacademies.co.uk

1 Victoria Square
Birmingham
B1 1BD

*Please ensure you include the name of the school in all correspondence with the DPO where appropriate.

What information do we collect and why do we require it?

By using closed circuit television (CCTV) systems the trust collects, stores, and uses static or moving images of individuals located in the surveillance area. By using e-safety monitoring software the trust collects and stores: domain names, URLs, browsing information, IP address, usernames, unencrypted traffic from individuals accessing the internet via the trust's IT network. The trust may be able to identify those individuals by using other existing information. The trust operates CCTV and e-safety monitoring software for the following purposes:

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

Who do we obtain your information from?

Much of the information we process will be obtained directly from you. However, we may need to collect data about you from, but not necessarily limited to, the following organisations:

- The Police and/or other Law Enforcement bodies

Who do we share your personal data with?

Your information will only be made available to trust employees where there is a need to investigate. Only authorised employees may have access to CCTV footage and e-safety logs.

E-safety monitoring is provided by a third-party processor. We have contractual clauses in place to ensure the security and integrity of the personal data.

We will only share CCTV footage or e-safety monitoring information 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.

Do you transfer my data outside of the UK?

Generally the information that the school holds is all held within the UK. However, some information may be held on computer servers which are held outside of the UK. We will take all reasonable steps to ensure your data is not processed in a country that is not seen as 'safe' by the UK government. If the trust does need to send your data out of the European Economic Area it will ensure it has extra protection from loss or unauthorised access. If you or your child moves to a school outside of the European Economic Area then the Trust will seek your explicit consent prior to transferring your personal information to that school.

How long do we keep your personal data for?

The trust will retain this data in line with the time period set out in their CCTV policy. Extracts of recordings required for evidential value will be retained for no longer than is necessary to fulfil the purpose for which they are required.

What is our lawful basis for processing your personal 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.

What rights do you have over your data?

Under UK 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 amended if inaccurate or incomplete
- to request that your personal data is erased where there is no compelling reason for its continued processing
- to request that the processing of your personal data is restricted
- to object to your personal data being processed

You can exercise any of these rights by contacting: dpo@ormistonacademies.co.uk.

If you have any concerns about the way we have handled your personal data or would like any further information, then please contact our DPO on the address provided above.

If we cannot resolve your concerns you may also complain to the Information Commissioner's Office (the Data Protection Regulator) about the way in which the Trust has handled your personal data. You can do so by contacting:

First Contact Team
Information Commissioner's Office
Wycliffe House, Water Lane
Wilmslow Cheshire
SK9 5AF