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**Privacy Statement – CCTV Data – FI12(H)**

**Three Counties Academy Trust (TCAT)**

**Effective Date:** Academic year 2024-2025 **Last Reviewed:** February 6th, 2025

**1. Introduction**

Three Counties Academy Trust, commonly referred to as TCAT, is committed to protecting the privacy and security of personal data. This privacy statement explains how we collect, use, and share **CCTV** data across all schools within TCAT in compliance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

TCAT is the **Data Controller** for the personal data captured by CCTV systems unless otherwise stated. Each school within TCAT follows this privacy statement to ensure consistency in data protection practices.

**2. What Data We Collect**

We collect, store, and process the following categories of CCTV data:

* **Video Footage** – Recordings of individuals on school premises captured by CCTV cameras
* **Still Images** – Where extracted from CCTV footage for security or investigatory purposes
* **Location Data** – Information about where the footage was recorded within TCAT school sites
* **Date and Time Stamps** – To provide an accurate record of when the footage was captured

CCTV systems do not record audio unless explicitly stated in a designated area for security or safeguarding purposes.

**3. Why We Collect and Use CCTV Data**

We process CCTV data under the following lawful bases as defined under UK GDPR:

* **Legal Obligation (Article 6(1)(c))** – To comply with safeguarding, security, and health and safety laws
* **Public Task (Article 6(1)(e))** – To ensure the security of school premises and the safety of pupils, staff, and visitors
* **Legitimate Interests (Article 6(1)(f))** – Where processing is necessary for crime prevention, investigation, and ensuring school security, balanced against individual rights

**4. How We Use CCTV Data**

We use CCTV data for the following purposes:

* To monitor and ensure the safety of pupils, staff, and visitors on school premises
* To prevent, investigate, and respond to security incidents, vandalism, and unauthorised access
* To assist in the detection, prevention, and investigation of crime
* To support the Trust’s safeguarding responsibilities
* To monitor compliance with health and safety regulations
* To provide evidence in disciplinary proceedings or legal matters where required
* To respond to requests from law enforcement agencies when necessary and lawful

**5. How We Store and Protect CCTV Data**

We take the security of CCTV data seriously and implement the following measures:

* **Physical Security** – Secure access to CCTV recording equipment and restricted access to viewing areas
* **Technical Security** – Encrypted storage, access controls, and secure networks
* **Organisational Measures** – Clear policies on access, retention, and authorised use of CCTV footage

CCTV recordings are retained for a **maximum of 30 days**, unless required for an ongoing investigation, legal matter, or safeguarding concern, in which case data may be retained for a longer period in accordance with legal and regulatory requirements.

**6. Who We Share CCTV Data With**

We only share CCTV data when it is lawful and necessary, including with:

* **Law Enforcement Agencies** – For the detection, investigation, and prevention of crime
* **Local Authorities** – Where required for safeguarding and security purposes
* **Legal Representatives and Insurers** – If needed for legal claims or investigations
* **School Leadership and Safeguarding Teams** – For the protection of pupils and staff in disciplinary or safeguarding matters
* **Security and Facilities Management Providers** – Where outsourced services are used for school security and site monitoring

All third parties we share data with must comply with strict data protection agreements.

**7. International Data Transfers**

We do not routinely transfer CCTV data outside the UK. If we do, we ensure appropriate safeguards are in place, such as **UK adequacy decisions** or **Standard Contractual Clauses (SCCs)**.

**8. CCTV Rights**

Under UK GDPR, individuals whose images are captured on CCTV have the following rights regarding their personal data:

* **Right to Be Informed** – About how we use CCTV data
* **Right of Access** – To request a copy of footage containing their image (subject to exemptions for third-party privacy)
* **Right to Rectification** – To correct inaccurate data (not applicable to video recordings)
* **Right to Erasure ("Right to Be Forgotten")** – In certain circumstances, to request deletion of footage
* **Right to Restrict Processing** – To limit how CCTV footage is used
* **Right to Object** – To CCTV recording in certain circumstances (e.g., specific locations where privacy expectations are higher)

To exercise any of these rights, please contact the Data Protection Officer (DPO) (details below).

**9. Contact Details**

For any questions about this privacy statement or to exercise your rights, please contact:

**S Smith Information Governance Officer and Data Protection Officer**on behalf of Three Counties Academy Trust  
Herefordshire Council, Plough Lane, Hereford, HR4 0LE  
Email: samsmith@herefordshire.gov.uk  
Tel: 01432 260282

If you have concerns about how your data is handled, you can also contact the **Information Commissioner’s Office (ICO):**

**ICO Website:** [**www.ico.org.uk**](https://www.ico.org.uk) **ICO Helpline:** 0303 123 1113

**10. Changes to This Privacy Statement**

We may update this privacy statement from time to time. Any significant changes will be communicated via our website and school communications.