



BRADFIELD COLLEGE

CCTV Privacy Notice

DRAFT: 18/12/2019 revised 21/12/19 (by SPW)

Last Updated:

1. Privacy Notice – CCTV

- This privacy notice has been written to inform members of the public, parents, pupils and staff of Bradfield College about how and why we process their personal data in relation to CCTV.
- The processing of personal data is governed by legislation relating to personal data, including the General Data Protection Regulation (the “GDPR) and the Data Protection Act 2018, and other legislation relating to personal data and rights, such as the Human Rights Act.
- “Personal data” is any information about a living individual, which allows them to be identified from that data. Identification can be by directly using the data itself or by combining it with other information which helps to identify a living individual.

2. Who are we?

- Bradfield College 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 responsibilities to you and your personal data, and will only collect and use your data in ways which are compliant with data protection legislation.
- The Data Controller can be contacted by writing to or calling the College’s Chief Operating Officer (COO) at:
 - Bradfield College; RG7 6AU
 - Email: COO@bradfieldcollege.org.uk
 - Telephone: 0118 964 4500

3. What information do we collect and why do we collect it?

- CCTV recordings made by Bradfield College contain:
 - images of pupils, employees and visitors to the College site and the movement of vehicles about the campus;
 - because there are public roads and pathways crossing the site, the College also records images of the public going about their daily business and some vehicular movement on the highways immediately adjacent to College buildings.
- Bradfield College operates CCTV for the following purposes:
 - For safeguarding of pupils of the College and other children on the site;
 - For the protection of College property and the prevention of crime;
 - To help assure the safety and security of those working on or visiting the College site

- Our lawful basis for processing your personal data is:
 - GDPR Article 6(1)(e): Processing is necessary in the exercise of the College's legal duty to safeguard children and for the better performance of health and safety duties undertaken in the public interest
 - GDPR Article 6(1)(f): Processing is necessary in pursuit of the College's legitimate interests to protect property, prevent crime and enhance the security of its site.
- You have rights as a data subject:
 - To be informed about how Bradfield College processes your personal data. This notice fulfils this obligation;
 - To be confident that your data is stored securely and kept no longer than is needed to fulfil the purposes specified in this Privacy Notice;
 - To be confident that your data is processed by Bradfield College with proper security, and that it is protected from unauthorised use;
 - To request access to your personal data held by the College, 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.

4. Other uses of your data:

- The CCTV database is used to record incidents that are actioned by the CCTV control room staff. This information may be used to produce reports, charts etc for internal analysis.
- Bradfield College may make further use of your data when it is necessary and proportionate to:
 - Assist in the investigation, detection and prosecution of criminal offences;
 - Safeguard against and prevent threats to public security;
 - Investigate, detect and prosecute breaches of ethics defined by the 'Teachers' Standards (2011)
 - Assist Insurance Companies, when authorised by the Data Protection and Compliance Team.

5. Where we get your data from?

- Data is collected from a network of CCTV Cameras feeding live video images into the CCTV control room;
- CCTV video images are recorded in real time onto a secure CCTV locked system which is stand-alone and not connected to any internal or external network.

6. How your information is stored

- All information that the school holds is all held within the on site servers.

7. Who has access to your personal data?

- Only employees authorised by College management may have access to CCTV footage.

8. Who do we share your personal data with?

- Bradfield College 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 detection or to assist in locating a missing pupil.
- Data will not be transferred outside the EEA.

9. How long do we keep your personal data for?

- The school will retain your data for one month from the day of recording.

10. Further Information.

- If you have any concerns about the way Bradfield College handles your personal data or would like any further information about the College's use of CCTV, please contact the COO's office at the address provided above.
- If you are not satisfied that the College is processing your data lawfully, fairly and transparently, you may complain to the Information Commissioner's Office (helpline on 0303 123 1113)