



Who are we?

Our school processes personal data relating to parents, pupils, staff, governors, visitors, and others, making it a data controller under the Trust's auspices. The Trust is registered as a data controller with the ICO and renews this registration as legally required.

The Data Protection Officer (DPO) oversees the implementation of this policy, monitors compliance with data protection law, and develops relevant policies and guidelines. The DPO provides annual reports to the Strategic Board of the Trust and reports data protection issues, breaches, and recommendations to the governing body and senior leadership team. The DPO also serves as the primary contact for local Data Leads (DL) and the ICO.

Our DPO is Mr Andrew Coker and can be contacted at data@salvatorian.harrow.sch.uk

What Information do we Collect and Why do we Collect it?

By using CCTV systems, the school collects, stores, and processes static or moving images of individuals within the surveillance area. The school may be able to identify individuals using other existing information.

The school operates CCTV for the following purposes:

- Safeguarding children
- Prevention and detection of crime

Our lawful basis for processing personal data is:

- **Article 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).
- **Article 6(1)(f)** – Processing is necessary for the purposes of legitimate interests (prevention and detection of crime).

Who has Access to your Personal Data?

CCTV footage is only accessible to authorised school employees when necessary for an investigation. Only employees designated by school management may access this footage.

Who do we Share your Personal Data with?

CCTV footage may be shared with other agencies where there is a lawful basis, such as:

- Police (for crime prevention or investigation)
- Authorities in cases of legal compliance or safeguarding concerns

How Long do we keep your Personal Data?

The school retains CCTV footage for one month unless exceptional circumstances require longer retention, such as law enforcement requests for investigations.

Do we transfer your Data Outside of the UK?

CCTV data is stored on servers in our local network. We take all reasonable steps to ensure data is processed in compliance with UK data protection laws.

What Rights do you have Over your Data?

Under UK GDPR, individuals have the following rights regarding their personal data:

- The right to be informed about how their data is processed
- The right to access their data and request copies

- The right to request data erasure where no compelling reason exists for its continued processing
- The right to object to processing under certain conditions

If you have concerns regarding the handling of your personal data, please contact our DPO at the address provided above.

If we cannot resolve your concerns, you may escalate your complaint to the Information Commissioner's Office (ICO):

First Contact Team

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow, Cheshire
SK9 5AF
casework@ico.org.uk
0303 123 1113

Last Updated: March 2025

Signed:

A Bryant – Head of School

A handwritten signature in black ink that reads "Alan Bryant". The signature is written in a cursive style with a large initial 'A'.

