

Aurora

CCTV Policy

Local Procedure

Aurora Foxes School

Please refer to Group CCTV Policy A114

Local procedure

Data Protection Impact Assessment

Aurora Foxes recognises that CCTV systems can be privacy intrusive.

For this reason, Foxes Academy has carried out a data protection impact assessment with a view to evaluating whether the CCTV system in place is a necessary and proportionate means of achieving the legitimate objectives as set out in the Aurora Group CCTV Policy.

The data protection impact assessment informs the service's use of CCTV and the contents of this procedure.

The system is used only for the purpose of fulfilling its aims (stated in section 1.1) of the Group Policy

When the CCTV system is replaced, developed, or upgraded a DPIA will be carried out to be sure the aim of the system is still a justifiable, necessary and proportionate means of achieving the legitimate objectives set out below.

The DPO will provide guidance on how to carry out the DPIA. The DPIA will be carried out by the School Business & Premises Manager in conjunction with the Site Lead.

Those whose privacy is most likely to be affected, including the those regularly accessing the service and neighbouring residents, will be consulted during the DPIA, and any appropriate safeguards will be put in place.

A new DPIA will be done whenever cameras are moved, or new cameras are installed. If any security risks are identified in the course of the DPIA, the service will address them as soon as possible.

Details and location of CCTV system

The CCTV system used by the service comprises of:

Camera Type	Location	Sound	Recording Capacity	Swivel/Fixed
FIELDS Static wide	on the external wall of Room 103 of Foxes Fields pointing towards the site entrance	N	Y	F

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FIELDS Pan/Tilt/Zoom	on the external wall of Room 101 of Foxes Fields pointing towards the site entrance.	N	Y	P/T/Z
FIELDS Static Wide	external wall of Room 104 of Foxes Fields pointing towards the fire assembly point.	N	Y	F
HIVE Static Wide	external wall of Room 115, pointing towards Foxes Hive front door	N	Y	F
HIVE Static Wide	external wall of Room 119 of Foxes Hive pointing towards the garden.	N	Y	F
HIVE Static Wide	external wall of Room 123 at the rear of Hive pointing towards the garden.	N	Y	F
HIVE Static Wide	external wall of Hive Room 143 pointing towards the garden.	N	Y	F
HIVE Static Wide	on the external bordering walls of Hive Rooms 149 & 150 pointing towards the garden.	N	Y	F
HOTEL Static Wide	at the left of the front door pointing towards the front garden.	N	Y	F
HOTEL Static Wide	at the fire exit by Dunster Bedroom pointing towards lane between Hotel & Hobby Horse	N	Y	F

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HOTEL Static Wide	on the front right of the Laundry Room, pointing towards the car park.	N	Y	F
HOTEL Static Wide	on the right of the rear fire exit door, pointing towards the car park.	N	Y	F
HOTEL Static Wide	on the left exterior wall of the Storeroom, pointing towards the blue shelter.	N	Y	F

Signs are displayed at all main entrances so that staff, students, neighbours & visitors and members of the public are made aware that they are entering an area covered by CCTV.

The signs contain contact details as well as a statement of purpose for which CCTV is used.

CCTV cameras are not installed in areas in which individuals would have an expectation of privacy such as toilets, changing facilities, etc.

System Management

Access to the CCTV system and data shall be password protected and will be kept in a secure area, with the HR, Business & Premises Managers.

The CCTV system will be administered and managed by the Business & Premises Managers along with the senior administrator who will act as System Managers and take responsibility for restricting access, in accordance with the principles and objectives expressed in the Aurora Group CCTV Policy.

The CCTV system is designed to be in operation each & every day of the year, though the service does not guarantee that it will be working during these hours.

CCTV images are not retained for longer than necessary, taking into account the purposes for which they are processed. Data storage is automatically overwritten by the system after a period of 14 days.

Recorded images will only be retained long enough for any incident to come to light (e.g., for a theft to be noticed) and the incident to be investigated. In the absence of a compelling need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than 6 months.

The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional. If the CCTV system is not working properly the System Manager will report the fault to the IT Team.

Cameras have been selected and positioned so as to best achieve the objectives set out in the Group CCTV Policy in particular by providing clear, usable images.

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Details of all visits and visitors and requests to view images will be recorded in a CCTV Access logbook including time/date of access and details of images viewed and the purpose for so doing which will be held by Business/Premises Manager & Senior Administrator locked in the CCTV control room.

The System Managers will ensure that the equipment is serviced periodically by a competent professional.

Complaints About the Use of CCTV

Any complaints in relation to the use of the CCTV system should be addressed to the Business/Premises Managers.

Requests for Access by the Data Subject

The Data Protection Act 2018 provides data subjects – those whose image has been captured by the CCTV system and can be identified – with the right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to the Business Manager.

Details of all subject access requests for images will be recorded on GDPR Sentry and in the CCTV Incident and Request Log.

Public Information

Copies of the Aurora Group CCTV Policy and this local procedure will be available to the public upon request.