

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

Aurora Foxes has two CCTV systems installed at:

- Fields & Hive
- Hotel & Loft

Fields/Hive CCTV

Refer to Appendix 1 for schematic

Camera Number	Camera Type	Location	Sound	Recording Capacity	Swivel/ Fixed
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1	Hanwha QNV-7082R CCTV Camera	External wall of Hive room 116	No	Yes	Fixed
2	Hanwha QNV-7082R CCTV Camera	External wall of Hive sleep-in room opposite room 116	No	Yes	Fixed
3	Hanwha QNV-7082R CCTV Camera	External wall of Hive room 142	No	Yes	Fixed
4	Hanwha QNV-7082R CCTV Camera	External wall between Hive rooms 122 & 123	No	Yes	Fixed
5	Hanwha QNV-7082R CCTV Camera	External wall of Hive room 142	No	Yes	Fixed
6	Hanwha QNV-7082R CCTV Camera	External wall of Hive room 141	No	Yes	Fixed
7	Hanwha QNV-7082R CCTV Camera	External wall of Hive room 141	No	Yes	Fixed
8	Hanwha QNV-7082R CCTV Camera	External wall of Fields room 101	No	Yes	Fixed
9	Hanwha QNV-7082R CCTV Camera	External wall of Fields room 101	No	Yes	Fixed
10	Hanwha QNV-7082R CCTV Camera	External wall of Fields room 103	No	Yes	Fixed
11	Hanwha QNV-7082R	External wall between	No	Yes	Fixed

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	CCTV Camera	Hive room 149 & 150			
12	Hanwha QNV-7082R CCTV Camera	External wall of Fields room 104	No	Yes	Fixed

Hotel & Loft CCTV

Refer to Appendix 2 for schematic.

Camera Descriptor	Camera Type	Sound	Recording Capacity	Swivel/ Fixed
Front Door	Hanwha PNM-C7083RVD CCTV Camera	No	Yes	Fixed
Front Corner	Hanwha PNM-C7083RVD CCTV Camera	No	Yes	Fixed
Side Door	Hanwha PNM-C7083RVD CCTV Camera	No	Yes	Fixed
Car Park	Hanwha PNM-C7083RVD CCTV Camera	No	Yes	Fixed
Side Gate	Hanwha PNM-C7083RVD CCTV Camera	No	Yes	Fixed

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.

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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 Manager & Premises Manager 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.

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.

A monthly audit is completed of both CCTV systems on Mitti (previously known as Safety Culture).

Complaints About the Use of CCTV

Any complaints in relation to the use of the CCTV system should be addressed to the Business Manager or 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.

Foxes Fields & Hive CCTV Schematic

Fields/View - Ground Floor

This diagram shows the ground floor plan of a building, featuring 159 rooms and 12 cameras. The layout is complex, with rooms numbered 100 through 159. Key areas include a central corridor, a large lounge (125), a dining room (126), a kitchen (127), and a storage area (128). The plan also shows various other rooms such as Room 100, Room 101, Room 102, Room 103, Room 104, Room 105, Room 106, Room 107, Room 108, Room 109, Room 110, Room 111, Room 112, Room 113, Room 114, Room 115, Room 116, Room 117, Room 118, Room 119, Room 120, Room 121, Room 122, Room 123, Room 124, Room 125, Room 126, Room 127, Room 128, Room 129, Room 130, Room 131, Room 132, Room 133, Room 134, Room 135, Room 136, Room 137, Room 138, Room 139, Room 140, Room 141, Room 142, Room 143, Room 144, Room 145, Room 146, Room 147, Room 148, Room 149, Room 150, Room 151, Room 152, Room 153, Room 154, Room 155, Room 156, Room 157, Room 158, and Room 159. The plan also shows various other areas such as a W/C, a storage area, and a lounge. The 12 cameras are positioned as follows: Camera 1 (top left), Camera 2 (top left), Camera 3 (bottom right), Camera 4 (top right), Camera 5 (bottom right), Camera 6 (bottom right), Camera 7 (bottom left), Camera 8 (bottom left), Camera 9 (bottom left), Camera 10 (top left), Camera 11 (bottom right), and Camera 12 (top left).

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Appendix 2

Foxes Hotel and Loft CCTV Schematic

