

## **Privacy Notice for CCTV Cameras Operated by SEND Transport Service**

### **Introduction**

This privacy notice explains how Achieving for Children's SEND Transport Service uses the personal data collected via Closed Circuit Television (CCTV) camera systems operated on AfC minibuses and taxis.

Achieving for Children is registered as a data controller with the Information Commissioner's Office (ICO). [Registration number ZA045069.](#)

### **Camera system we operate**

AfC minibuses used to transport children assessed as eligible for home to school transport are fitted with internal and external CCTV cameras. The internal cameras and audio recording equipment capture and monitor any individuals including drivers, children, passenger assistants entering the minibuses. The external cameras monitor the driver's road conduct and traffic offences.

### **Why we operate CCTV cameras**

Under data protection legislation, we are only allowed to use personal information if we have a lawful basis to do so. In the case of CCTV cameras, we operate them in support of our statutory duty to make transport arrangements for all children who are eligible to facilitate a child's attendance at school.

We operate the cameras for these main purposes:

- to protect the health and safety of children, staff and members of the public
- to safeguard vulnerable children using the mini buses, AfC staff and members of the public
- to facilitate AfC staff training
- to assist in investigating and defending against complaints and litigation claims
- to support the prevention and detection of crime
- to act as a deterrent from contravening parking and road traffic regulations
- to support the efficient management of the SEND transport service

## **Camera locations**

Each minibus is fitted with four cameras as outlined below:

- behind the rear view mirror pointing outwards toward the road.
- nearside camera covering the side passenger doors and the road.
- inside the bus covering all passengers including the driver
- rear view camera covering tail lift and the road.

## **Who we share your personal information with**

We will only share information where it is appropriate and legal to do so. Where this is necessary, we are required to comply with all aspects of the Data Protection Act 2018.

In some circumstances, the disclosure of CCTV images to the police and other enforcement agencies is permitted by data protection legislation, if they relate to the prevention or detection of crime and/or the apprehension or prosecution of offenders. Before any such disclosure takes place, the police are required to demonstrate that the personal data concerned will assist them in this respect. Each police request to Achieving for Children is dealt with on a strictly case-by-case basis to ensure that any such disclosure is lawful.

## **How long will we keep your information**

The CCTV recording system records on a loop only holding data for 28 days, after this period the oldest data will automatically be overwritten. The data may be held for longer but only where we are legally required to do so such as in the case of an on-going investigation.

## **Keeping your personal information secure**

We have appropriate security measures in place to prevent personal information from being accidentally lost or used or accessed in an unauthorised way. We limit access to your personal information to those who have a genuine business need to know it. Those processing your information will do so only in an authorised manner and are subject to a duty of confidentiality.

The CCTV recording is stored on an encrypted hard drive which can be accessed with a key and the data can only be viewed with an encryption card. There are robust procedures in place to limit access to the data to management staff only. The CCTV systems is not wifi enabled so there is no risk of the data being intercepted from wireless transmission systems.

We also have procedures in place to deal with any suspected data security breach. We will notify you and any applicable regulator of a suspected data security breach where we are legally required to do so.

### **Your rights and access to information**

Under data protection legislation you have the right to request access to the information that we hold about you. To request a copy of your data, please read the [Subject Access Requests](#) page on this website and then submit your request using your preferred method of contact.

You also have the right to:

- object to the processing of personal data that is likely to cause, or is causing, damage or distress
- in certain circumstances to have inaccurate personal data rectified, blocked, erased or destroyed
- prevent processing for the purpose of direct marketing
- object to decisions being taken by automated means
- redress, either through the ICO, or through the courts

If you have any questions or concerns about the way we process personal data, please contact our Data Protection Officer: [dpo@achievingforchildren.org.uk](mailto:dpo@achievingforchildren.org.uk)

If you want to make a complaint about how we handle your personal data, we ask that you give our Data Protection Officer the opportunity to respond in the first instance but you are not obliged to do this. You can make a complaint directly to the Information Commissioner's Office at <https://ico.org.uk/concerns/>

If you would like to discuss anything in this privacy notice, please contact our Data Protection Officer: [dpo@achievingforchildren.org.uk](mailto:dpo@achievingforchildren.org.uk)