

# CCTV Policy & Procedure

**Policy Owner:** Senior Leadership Team (SLT)

**Date of Issue:** November 2025

**Next Review Date:** November 2026

## 1. Purpose of This Policy

The Inspire and Achieve Foundation uses Closed Circuit Television (CCTV) systems to help maintain a safe and secure environment for staff, volunteers, young people, visitors, and the charity's property. This policy explains how CCTV is managed, how footage is used, and how the Foundation complies with data protection legislation including the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**, as guided by the **Information Commissioner's Office (ICO)**.

## 2. Reasons for Using CCTV

We use CCTV for the following purposes, all of which are justified under ICO and UK GDPR standards:

1. **To ensure the safety and security of staff, volunteers, young people, and visitors.**
2. **To protect the buildings, equipment, and property from damage, theft, or misuse.**
3. **To prevent and detect crime.**
4. **To assist in investigations relating to safeguarding concerns or misconduct.**
5. **To support the effective management of the organisation when incidents occur on-site.**

CCTV is *not* used for staff performance monitoring, routine supervision, or any automated decision-making. The Inspire and Achieve Foundation has completed and documented a **Legitimate Interests Assessment (LIA)** in accordance with Article 6(1)(f) UK GDPR. The assessment confirms the necessity and proportionality of CCTV use and is reviewed annually or where CCTV use changes.

## 3. Lawful Basis for Processing CCTV Footage

In accordance with Article 6 of the UK GDPR, the Foundation relies on the following lawful bases:

- **Legitimate Interests (Article 6(1)(f)):**  
The charity has a legitimate interest in maintaining safety, security, and safeguarding, which outweighs the minimal impact on the privacy of individuals using and visiting our premises.

In safeguarding or criminal incidents, processing may additionally rely on:

- **Vital Interests (Article 6(1)(d)),** or
- **Legal Obligation (Article 6(1)(c)),** where applicable.

### 3A. Data Protection Impact Assessment (DPIA)

A **Data Protection Impact Assessment (DPIA)** has been carried out for the CCTV system in accordance with Article 35 UK GDPR and ICO CCTV guidance.

The DPIA assesses risks to individuals' privacy and sets out appropriate mitigation measures, including:

- Proportionate camera placement and angles
- Use of clear signage and transparency measures
- Restricted access to recordings
- Defined retention periods
- Secure storage and deletion procedures

The DPIA is reviewed annually or sooner if there are changes to CCTV locations, purposes, or technologies.

#### 4. Responsibility for CCTV Management

The **Senior Leadership Team (SLT)** is responsible for the overall management, compliance, and operation of the CCTV system.

The SLT is responsible for ensuring that:

- CCTV signage is displayed and compliant with ICO guidance.
- Access controls and security measures are up to date.
- Requests for footage are managed in line with data protection legislation.
- Staff adhere to this policy.
- Legitimate Interests Assessments, DPIAs, and Records of Processing Activities relating to CCTV are maintained and kept up to date

#### 5. Access to CCTV Footage

- **Only members of the Senior Leadership Team** are authorised to access CCTV footage.
- Access is restricted by secure login and password protections.
- **All access must be recorded in the CCTV Access Log**, including:
  - Name of authorised staff member accessing the footage
  - Date and time of access
  - Reason for accessing the footage
  - Name of the SLT member providing prior approval
- Access will only be granted when necessary and proportionate to meet the legitimate purposes listed in section 2.
- The CCTV system will need to be accessed by an external agency when carrying out maintenance visits. This should be recorded in the CCTV Access Log and should only be used for the purpose of servicing the system.

Unauthorised access or misuse will be treated as a disciplinary matter and may constitute a data breach reportable to the ICO.

### **Third-Party Processing**

Where external contractors or maintenance providers require access to the CCTV system, they are treated as **data processors**.

Any such access is governed by a written **Data Processing Agreement** in accordance with Article 28 UK GDPR, ensuring confidentiality, security, and restricted use solely for maintenance purposes

## **6. Security Measures to Protect CCTV Data**

The Inspire and Achieve Foundation takes the following steps to secure CCTV data:

1. CCTV systems are password-protected and accessible only to authorised SLT personnel.
2. Footage is stored on a secure system and encrypted storage devices.
3. Physical access to CCTV equipment is locked and restricted.
4. Regular system checks ensure that cameras and storage systems are functioning correctly.
5. Cybersecurity measures, including firewalls and anti-malware tools, protect digital footage.
6. Access logs are reviewed regularly to detect any unauthorised access.

### **6A. Prohibited and Restricted Use of CCTV Technology**

The CCTV system:

- Does **not** record audio.
- Does **not** use facial recognition, biometric analysis, behaviour monitoring, or automated decision-making.
- Is not used for covert monitoring.

Any future introduction of new surveillance technologies will require prior approval from the Senior Leadership Team and completion of a new DPIA.

## **7. Retention Period**

- CCTV footage is retained for a maximum of **30 days**.
- Footage may be retained longer only when:
  - It is required for an ongoing investigation, safeguarding concern, or potential legal claim.
- Once no longer required, footage will be securely deleted.
- The CCTV system will automatically delete recordings after 30 days.

Retention periods are recorded in the Foundation's **Records of Processing Activities (ROPA)** and reviewed annually to ensure ongoing necessity and proportionality.

## 8. Sharing of CCTV Footage

CCTV footage will only be shared when lawful, necessary, and proportionate. Potential recipients include:

- **Police or other law enforcement agencies** (for the purpose of crime prevention or investigation).
- **Safeguarding authorities** where relevant to child or vulnerable adult welfare.
- **Insurers or legal representatives** involved in a claim or investigation.
- **Data subjects**, where disclosure is required as part of a valid Subject Access Request and does not infringe on the rights of others.

Footage will *not* be shared with third parties for marketing or non-essential purposes.

All disclosures to law enforcement or safeguarding authorities are documented, including the date, recipient, legal basis, and footage disclosed.

Requests from law enforcement are verified before disclosure and footage is shared securely and proportionately.

## 9. Subject Access Requests (SARs)

Individuals have the right to request access to CCTV footage in which they appear. Requests must:

- Be submitted in writing
- Provide sufficient information to identify the individual and the specific footage requested

The charity may need to blur or redact other identifiable individuals to comply with data protection law. Requests will be responded to within **one month**, in line with UK GDPR timescales.

Where footage includes identifiable third parties, the Foundation will redact or blur images where reasonably practicable to protect the rights and freedoms of others.

A record of redaction decisions will be retained to demonstrate compliance.

## 10. Signage and Transparency

CCTV signage is placed at all entry points and wherever cameras operate. Signs clearly communicate:

CCTV signage clearly states:

- That CCTV recording is taking place
- The purpose of CCTV (safety, safeguarding, and crime prevention)
- The identity of the data controller (Inspire and Achieve Foundation)
- Contact details for data protection enquiries
- Where further privacy information can be found (Privacy Notice link or QR code)

This ensures transparency, as required by ICO guidance.

## **11. Breaches of This Policy**

Any breach of this policy or misuse of CCTV may result in:

- Disciplinary action
- Revocation of system access
- Reporting to the ICO where necessary
- Possible legal action in serious cases

## **12. Review of Policy**

This policy will be reviewed annually by the Senior Leadership Team, or sooner if:

- Significant changes occur to CCTV infrastructure
- Legislation or ICO guidance changes
- A data breach necessitates earlier review

### **12A. Staff Training and Awareness**

Authorised staff members who may access CCTV footage receive regular data protection training, including:

- Lawful access and viewing of footage
- Data minimisation principles
- Subject Access Request handling
- Secure sharing and redaction practices

Training records are maintained by the Foundation.

### **12B. ICO Registration**

The Inspire and Achieve Foundation is registered with the Information Commissioner's Office and has paid the applicable data protection fee, unless otherwise exempt.