

# CCTV Policy



The Spark Group

## Introduction

This policy explains how The Spark Group uses Closed Circuit Television (CCTV) to help maintain the safety and security of employees, learners, visitors, and premises.

We are committed to operating CCTV in a lawful, fair, and proportionate way, in line with UK data protection legislation.

## Scope

This policy applies to:

- Employees;
- Learners;
- Visitors;
- Contractors;
- Any other individuals present on The Spark Group premises

## Purpose

CCTV is used for the following purposes only:

- To help protect the safety and wellbeing of staff, learners, and visitors;
- To deter and detect crime, theft, harassment, or anti-social behaviour;
- To assist with health and safety investigations;
- To support law enforcement or emergency services where required

## Lawful Basis

CCTV footage is processed in line with Data Protection and GDPR laws and legislation. The Spark Group's legitimate interests are:

- Maintaining a safe and secure environment;
- Protecting people, property, and assets

CCTV use is limited to what is necessary for these purposes and is balanced against individuals' privacy rights.

## Location of Cameras

- Cameras are installed only in public or communal areas of the premises;
- Cameras are not installed in private areas such as toilets or changing facilities;
- Camera positioning is chosen to minimise intrusion and is reviewed periodically

Clear signage is displayed at entrances and within the premises to inform individuals that

CCTV is in operation and explain its purpose.

### **Access to CCTV Footage**

- Access to CCTV footage is restricted to authorised members of staff;
- Footage is accessed only when there is a legitimate reason, such as investigating an incident;
- Any access or sharing of footage is kept to a minimum and handled responsibly

### **Disclosure of Footage**

CCTV footage may be shared:

- With the police or other authorities where legally required;
- With insurers or legal advisers in connection with an incident

Footage will not be shared with third parties without a lawful basis.

### **Retention of Footage**

- CCTV footage is normally retained for up to 30 days;
- Footage linked to an incident may be retained for longer where necessary;
- Retained footage will be reviewed periodically and securely deleted when no longer required

### **Data Protection and Individual Rights**

CCTV recordings are personal data under UK data protection law.

Individuals have the right to:

- Request access to CCTV footage in which they appear;
- Raise concerns about how CCTV is used

Requests should be made to The Spark Group and will be responded to within one month, in line with legal requirements.

### **Use of Third Party Systems**

The Spark Group uses third-party CCTV equipment and services.

The Spark Group remains the data controller for all CCTV footage and is responsible for ensuring compliance with data protection law.

### **Covert Monitoring**

Covert CCTV monitoring will not be carried out except in exceptional circumstances, such as suspected criminal activity, and only where permitted by law.

### **Complaints**

Any concerns or complaints about the use of CCTV should be raised with a member of the Senior Leadership Team and will be handled promptly and appropriately.

Individuals may also raise concerns with the Information Commissioner's Office (ICO) if they remain dissatisfied.

### **Review**

This policy will be reviewed annually or sooner if there are changes to:

- Legislation;
- CCTV systems

### **Approval**

This policy has been approved by The Spark Group's Senior Leadership Team.

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<b>Document written by:</b>	Debbie Sturridge, Business Manager
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