



CCTV Policy

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1. Policy Statement

1.1 The Company uses Closed Circuit Television ("CCTV") on the premises. The purpose of this policy is to set out the position of the Company as to the management, operation and use of the CCTV across all company offices, rooms and buildings.

1.2 This policy applies to all members of our workforce, visitors to the Company and its surrounding area and all other persons whose images may be captured by the CCTV system.

1.3 This policy takes account of all applicable legislation and guidance, including:

- 1.3.1 UK General Data Protection Regulation ("UK GDPR"), tailored by the Data Protection Act 2018
- 1.3.2 CCTV Code of Practice produced by the Information Commissioner's Office (ICO)
- 1.3.3 Human Rights Act 1998



2. Purpose of CCTV

The Management team will use CCTV for the following purposes:

- To provide a safe and secure environment for staff and visitors
- To prevent the loss of or damage to the buildings and/or assets
- To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

3. Lawful Basis of Processing

Innov8 Workshops relies on its **recognised legitimate interests** as the lawful basis for operating CCTV. Under the safeguarding and crime pre-approved conditions.

4. Description of System

4.1 We have 9 cameras installed that cover the front doors to both buildings, Reception, car parks, fitness suite, wood workshop, common area and the play area.

4.2 The cameras are in operation 24 hours a day, 7 days a week and the playback footage stores for 30 days.

4.3 The monitoring system is situated in the Office and can only be viewed by relevant staff members. It is password protected.

5. Siting of Cameras

5.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff and visitors.

5.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Innov8 Workshops will make all reasonable efforts to ensure that areas outside of the premises and grounds are not recorded.

5.3 **Clear signage** will be erected to inform individuals that they are in an area within which CCTV is in operation. Signs will include:

- Innov8 Workshops as the data controller
- The purpose of monitoring (safety, security, crime prevention)
- Contact details for further information

5.4 Cameras will not be sited in any areas where members of staff have an expectation of privacy, such as changing rooms or toilets.



5.5 Cameras may be in communal areas and, where this is the case, visitors and members of staff will be made aware. Access to the footage is restricted and will only be used to fulfil the purposes in Section 2.

6. Privacy Impact Assessment

6.1 Prior to the installation or repositioning of any CCTV camera, or system, a privacy impact assessment will be conducted to ensure that the proposed installation is compliant with legislation and ICO guidance. The assessment will be approved by the designated Data Protection Officer (DPO).

6.2 The Company will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

7. Management and Access

7.1 The CCTV system will be managed by the Chief Executive Officer – Daniela Symons.

7.2 Any allegations against company staff will be referred immediately to the CEO – Daniela Symons or the Chair of Trustees – Phil Shelley and only they will determine who needs to view the footage and the course of action necessary.

7.3 On a day-to-day basis the CCTV system will be operated by individuals who have been specifically trained in the operation of the system and are both competent and considered to have the appropriate technical ability.

7.4 Recorded images which are stored by the CCTV system will be restricted to the view of relevant persons only.

7.5 Relevant images may be shared with others if to allow them to review incidents where disciplinary matters or complaints need to be addressed.

7.6 Where **third-party service providers** (e.g., IT contractors or CCTV maintenance providers) have access to CCTV systems, Innov8 Workshops ensures that appropriate Data Processing Agreements are in place, in compliance with Article 28 UK GDPR.

7.7 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.

7.8 The CCTV system is checked daily to ensure that it is operating effectively.



8. Storage and Retention of Images

8.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

8.2 Recorded images are stored for a maximum of 30 days unless there is a specific purpose for which they are retained for a longer period (e.g., ongoing investigation).

8.3 After the retention period expires, all CCTV footage is **securely deleted** using methods that prevent recovery.

8.4 Appropriate security measures are in place to prevent unlawful or inadvertent disclosure, including:

- CCTV recording systems being located in restricted access areas
- Encryption/password protection
- Restriction of the ability to make copies to specified staff

8.5 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Innov8 Workshops.

9. Disclosure of Images to Data Subjects

9.1 Any individual recorded in CCTV images is a data subject for the purposes of UK GDPR and has the right to request access.

9.2 Such a request will be treated as a Data Subject Access Request (DSAR). This will be considered in line with Innov8 Workshops' Data Protection Policy.

9.2A In line with the Data (Use and Access) Act 2025, where a DSAR relating to CCTV footage cannot be progressed without further information from the requester (for example, the date, time, or location of the incident or camera concerned), the one-month statutory response period will be paused ("the clock stopped") from the date such information is requested until it is received. Innov8 Workshops will only use this pause where the information is genuinely needed to locate the relevant footage, and will confirm to the requester when the clock has been paused and when it resumes.

Where a search for the requested footage would not be reasonable and proportionate given the scope of the request, Innov8 Workshops will provide such confirmation, personal data, and information as can be identified through a reasonable and proportionate search and will explain this to the requester.



9.3 Additional Data Subject Rights under UK GDPR include:

- Right to erasure (“right to be forgotten”)
- Right to restrict processing
- Right to object to processing
- Right to lodge a complaint with the ICO

9.4 Requests will be handled carefully, balancing the requester’s rights with the privacy of others who may appear in the footage. Redaction or masking will be applied where possible.

9.5 A record of all requests and disclosures will be maintained securely.

10. Disclosure of Images to Third Parties

10.1 We will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with UK GDPR and our own Data Protection Policy.

10.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

10.3 If a request is received from a law enforcement agency, the individual with access to the footage must obtain detail of the specific purpose, and disclosure must be carefully limited to relevant footage.

10.4 All disclosures must be recorded, including date, recipient, purpose, and extent of disclosure.

10.5 Court orders for disclosure will be complied with, subject to review and legal advice if necessary.

11. Review of Policy and CCTV System

11.1 This policy will be reviewed every year, or earlier should the need arise, to ensure compliance with UK GDPR and ICO guidance.

12. Misuse of CCTV Systems

12.1 The misuse of CCTV system could constitute a criminal offence.

12.2 Any member of staff who breaches this policy may be subject to disciplinary action.



13. Complaints

13.1 Any complaints relating to this policy or to the CCTV system operated by Innov8 Workshops should be made in accordance with Innov8 Workshops' Complaints Policy available on our website.

13.2 In line with the Data (Use and Access) Act 2025, Innov8 Workshops maintains a documented process for handling complaints specifically relating to the processing of personal data, including CCTV footage. Complaints of this nature will be acknowledged and investigated in accordance with that process, and the complainant will be kept informed of the outcome.