



TRAINING FOR  
ELECTRICIANS LTD

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# CCTV POLICY

# 2026



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<b>Document Control Table</b>	
Item	Detail
Version	1V
Approved By	Senior Management Team
Date Approved	09.01.2026
Policy Owner	Operations Manager / Data Protection Lead
Review Frequency	Every 2 years
Next Review Date	09.01.2028
Policy Family	Safeguarding, Health & Safety, Data Protection
Policy Status	Approved

**Applies to:**

- ✓ Staff
- ✓ Learners (including under 18s)
- ✓ Visitors
- ✓ Contractors
- ✓ Volunteers
- ✓ Employers (where on site)

**Published Locations:**

- ✓ Staff Handbook
- ✓ Centre Policies Folder
- ✓ Website (on request)

## 1. Purpose of the Policy

### 1.1 Our Responsibility

Training for Electricians Ltd takes its responsibility towards the safety and welfare of learners, staff, visitors, and contractors extremely seriously. CCTV systems are recognised as potentially privacy-intrusive and are therefore deployed only where necessary, proportionate, and justified.

A Data Protection Impact Assessment (DPIA) has been carried out to assess the necessity and proportionality of CCTV usage within the training centre. The outcome of this assessment informs the operation of the CCTV system and the content of this policy.

The purpose of this policy is to ensure that:

- CCTV is used lawfully, fairly, and transparently
- CCTV supports safeguarding, health and safety, and crime prevention
- Personal data is protected in line with UK GDPR and the Data Protection Act 2018
- Individuals are reassured that CCTV footage is handled appropriately

### 1.2 Use of CCTV

The CCTV system is used for the following purposes:

- To promote the safety and welfare of learners, staff, and visitors
- To deter and detect criminal activity or anti-social behaviour
- To assist with safeguarding and behaviour management
- To support investigations into incidents, accidents, or complaints
- To protect the training centre, equipment, and assets
- To support health and safety compliance in a practical electrical environment

### 1.3 CCTV Will Not Be Used For

- Monitoring private areas such as toilets or changing areas
- Monitoring staff performance, attendance, or capability
- Continuous monitoring of individuals without justification
- Monitoring private property beyond the site perimeter
- Any form of automated decision-making or facial recognition
- Audio recording

### 1.4 Commitment

Training for Electricians Ltd ensures that:

- CCTV use has a clear lawful basis under UK GDPR Article 6
- CCTV is proportionate and not excessive
- Signage is clearly displayed informing individuals of CCTV use
- Footage is stored securely and retained only as long as necessary
- CCTV use is reviewed regularly
- CCTV footage is not used for purposes other than those stated

## 2. Legal Framework

This policy complies with the following legislation and guidance:

- UK General Data Protection Regulation (UK GDPR)
- Data Protection Act 2018
- Protection of Freedoms Act 2012
- Human Rights Act 1998
- Freedom of Information Act 2000
- Children Act 1989 and 2004
- Equality Act 2010
- ICO CCTV Code of Practice
- ICO "In the Picture" CCTV Guidance

## Ex3. Roles and Responsibilities

### 3.1 Data Controller

Training for Electricians Ltd is the Data Controller for all CCTV footage.

### 3.2 Data Protection Lead / Operations Manager

Responsible for:

- Ensuring lawful operation of CCTV
- Handling Subject Access Requests (SARs)
- Ensuring retention and deletion schedules are followed
- Maintaining CCTV access records
- Liaising with regulators and external bodies where required

### 3.3 Authorised CCTV Operators

Only authorised staff may access CCTV footage. They must:

- Access footage only for legitimate purposes
- Maintain confidentiality at all times
- Record all access in the CCTV access log
- Comply fully with this policy and data protection law

## 4. Purpose and Justification

CCTV is installed only where necessary to:

- Safeguard learners (particularly those under 18)
- Maintain a safe learning environment
- Protect staff and visitors
- Reduce risk in practical electrical training areas

CCTV deployment is reviewed whenever:

- Cameras are added, removed, or repositioned
- Blind spots are identified
- Systems are upgraded
- Layout or usage of the building changes

## 5. Data Protection Principles

CCTV data is:

- Processed lawfully, fairly, and transparently
- Collected for specific, explicit purposes
- Adequate, relevant, and not excessive
- Accurate and up to date
- Retained only for as long as necessary
- Stored securely to prevent unauthorised access

## 6. Objectives of CCTV Use

- Promote safeguarding and learner welfare
- Reduce risk and prevent incidents
- Support investigations into accidents or misconduct
- Deter inappropriate behaviour
- Protect centre property and equipment

## 7. Protocols

- The CCTV system is registered with the ICO
- Cameras do not record audio
- Signage is displayed at entry points and monitored areas
- Blind spots are minimised and reviewed regularly
- CCTV is not actively monitored unless an incident occurs
- CCTV does not use AI, facial recognition, or behavioural analysis

## 8. Security

- CCTV systems are password-protected
- Access is limited to authorised staff only
- Footage downloads are logged and encrypted
- Any copied footage is stored securely and access-controlled
- Footage used for investigations is sealed and retained appropriately

## 9. Privacy by Design and Maintenance

- DPIAs are conducted before system changes
- Camera locations and coverage are documented
- Systems are maintained under service contracts
- Privacy impact is reviewed regularly
- Alternative measures are considered where CCTV would be intrusive

## 10. Code of Practice

Training for Electricians Ltd ensures that CCTV:

- Is transparent and proportionate
- Respects individual privacy
- Is used only for stated purposes
- Is subject to audit and review
- Supports safeguarding and public safety

## 11. Access to CCTV Footage

### 11.1 Subject Access Requests

Individuals may request access to footage of themselves under UK GDPR.

- Requests must be made in writing
- Identity will be verified
- Responses will be provided within one month
- Third-party images will be redacted where required

### 11.2 Disclosure to Third Parties

Footage may only be shared with:

- Police or law enforcement
- Legal representatives
- Regulators where lawfully required

All disclosures are logged.

## 12. Monitoring and Review

This policy is reviewed:

- Every two years
- Following legislative change
- After significant incidents

## 13. Breaches and Complaints

- Any misuse of CCTV will be investigated
- Breaches may result in disciplinary action
- Complaints relating to CCTV are handled through the Complaints Policy



- I agree to ensure that the chain of evidence remains intact, as the footage might be required for evidential purposes.
- I agree to report any security, privacy, safeguarding and GDPR concerns to the management as appropriate.
- I will log all access to the CCTV views, access, and recordings into the CCTV Logs in accordance with this policy. I agree that while using this system I will comply with all the Training for Electricians policies and procedures

Staff Full Name			
Job Title			
Department			
Agreement Start Date:			
Agreement End Date:			
I take full responsibility for the role. I have read and understood the agreement and this policy and agree to be bound by it, I also agree to notify the Trust in the event that circumstances change.			
SIGNED		DATE	
AUTHORISED BY (Aldridge Education)		DATE	