



CCTV Compliance Review Procedure

Procedure no:	HSE 4.4a
Version no. & date:	Version 1.0 – May 2026
Author:	Pauline Williams
Last review date:	N/A – new document
Next review due:	May 2028
Responsible Committee:	Operations Committee
Approved by & date:	To be completed upon approval
Parent policy:	HSE 4.4 CCTV Policy
Linked documents:	HSE 4.4b CCTV Evidence and Access Log; DIG 2.4 Records Management and Data Retention Policy v3; DIG 2.7 Subject Access Request and Individual Data Rights Policy v4
Audience:	All staff authorised to operate or access CCTV systems; Facilities Manager; Head of IT

1. Purpose

This procedure supports the implementation of HSE 4.4 CCTV Policy. It sets out the operational steps for the annual CCTV compliance review, the management of footage access and disclosure, and the use of CCTV footage for staff training purposes. It is intended for use by the Facilities Manager, Head of IT, and any staff authorised to operate or access CCTV systems at UK College of Business and Computing (UKCBC or the College).

This procedure does not form part of the formal policy approval cycle. Minor operational updates may be approved by the Director of Governance Quality and Student Success without committee submission, provided the parent policy (HSE 4.4) is not amended.

2. Scope

This procedure applies to:

- the annual CCTV compliance review required by HSE 4.4 Section 13;
- all requests to access or disclose CCTV footage, including subject access requests and requests from law enforcement; and
- any proposal to use CCTV footage for staff training purposes.

This procedure covers CCTV systems operated at all UK premises of UKCBC. It does not govern other forms of surveillance or recording.

3. Annual CCTV Compliance Review

3.1 Timing and Responsibility

The Facilities Manager must complete the annual compliance review by 31 March each year, or within three months of any significant change to CCTV infrastructure. The completed review must be

submitted to the Director of Governance Quality and Student Success, who will report outcomes to the Operations Committee.

3.2 Review Checklist

The review must address each of the areas set out in the checklist below. Evidence must be recorded in the HSE 4.4b CCTV Evidence and Access Log (Compliance Review tab). Where a finding is rated N (non-compliant), the Facilities Manager must record a corrective action and target date.

Section A – Camera Justification

Ref	Camera Justification	Compliant? (Y / N / N/A)	Evidence / Notes
A1	Each camera installation has a documented purpose and justification on file.		
A2	The documented justification confirms that less intrusive alternatives were considered before CCTV was deployed.		
A3	Coverage does not extend to areas where a high expectation of privacy applies (toilets, prayer rooms, changing areas).		
A4	Any cameras deployed within staff workspaces have written approval from the Director of Governance Quality and Student Success on file.		
A5	The camera register is current and reflects all active cameras on the premises.		

Section B – DPIA Currency

Ref	DPIA Currency	Compliant? (Y / N / N/A)	Evidence / Notes
B1	A Data Protection Impact Assessment (DPIA) has been completed for each CCTV system or significant expansion of coverage.		
B2	DPIAs have been reviewed within the past 24 months or following any significant change to the system or its purpose.		
B3	Outstanding DPIA actions from previous reviews have been completed.		

Section C – Signage

Ref	Signage	Compliant? (Y / N / N/A)	Evidence / Notes
C1	Signage is displayed at all building entry points where CCTV is in operation.		
C2	Signage is visible, legible and in good condition.		
C3	Each sign identifies UKCBC as the data controller and provides a contact address (dpo@ukcbc.ac.uk).		
C4	Signage has been reviewed following any change to camera positioning or coverage.		

Section D – Access Logs and Disclosure Records

Ref	Access Logs and Disclosure Records	Compliant? (Y / N / N/A)	Evidence / Notes
D1	The HSE 4.4b CCTV Evidence and Access Log is current and all footage access events have been recorded.		
D2	All disclosures of footage to third parties have been recorded with the recipient, purpose, date and authorising officer.		
D3	Access to footage has been limited to authorised personnel only.		
D4	The list of authorised personnel is current and reflects current staff roles.		

Section E – Retention and Disposal

Ref	Retention and Disposal	Compliant? (Y / N / N/A)	Evidence / Notes
E1	Footage not subject to a retention extension has been deleted within 30 days of capture.		
E2	All retention extensions beyond 30 days have been documented with a reason and anticipated retention period.		
E3	Disposal of footage has been recorded in the HSE 4.4b log.		
E4	Retention periods in use are consistent with the DIG 2.4 Records Management and Data Retention Policy.		

Section F – Training Use of CCTV Footage

Ref	Training Use of CCTV Footage	Compliant? (Y / N / N/A)	Evidence / Notes
F1	Any use of CCTV footage for staff training has been assessed against the decision framework in Section 4 of this procedure.		
F2	Where footage used for training includes identifiable individuals, consent was obtained or images were appropriately obscured.		
F3	Where a DPIA was required for training use, this has been completed and is on file.		
F4	Training use of footage has been recorded in the HSE 4.4b log.		

3.3 Escalation

Where the review identifies a material non-compliance that cannot be remedied within 30 days, the Facilities Manager must escalate to the Director of Governance Quality and Student Success immediately. The Director must determine whether the matter requires notification to the Operations Committee outside the normal reporting cycle.

4. Use of CCTV Footage for Staff Training Purposes

4.1 General Principle

CCTV footage may only be used for staff training purposes where the use is consistent with the original purpose for which the footage was captured, or where there is a separate lawful basis under UK GDPR. The decision to use footage for training must be considered carefully, given the potential impact on the privacy rights of individuals captured in the footage.

4.2 Decision Framework

Before using any CCTV footage for training, the Facilities Manager must work through the following steps in order. Each step must be recorded in the HSE 4.4b log.

Step 1 – Consider whether an alternative training method is sufficient.

Before using CCTV footage, consider whether the training objective can be achieved through:

- reflection sessions with staff involved in the incident;
- written or verbal description of the event;
- training videos produced using actors; or
- diagrams or written process materials.

If an alternative is sufficient, CCTV footage must not be used.

Step 2 – Assess identifiability.

If CCTV footage is the only or most effective option, determine whether any individual in the footage (including members of the public, students or staff) is identifiable. If no individual is identifiable, proceed to Step 3. If individuals are identifiable:

- seek consent from each identifiable individual before use; or
- obscure or pixelate the images of identifiable individuals to a standard that prevents identification.

If consent cannot be obtained and images cannot be adequately obscured, the footage must not be used for training unless a DPIA (Step 5) concludes that use is justifiable.

Step 3 – Assess the setting and content.

Consider:

- whether the setting of the incident could be considered contentious or sensitive;
- whether the footage shows conduct that could embarrass or harm individuals depicted; and
- whether there are welfare implications for staff who will view the footage.

Step 4 – Confirm the training context.

Clarify whether the footage is to be used in an informal debrief or as part of a more formal training event.

Formal training events require a higher level of justification and documentation.

Step 5 – Complete a DPIA where required.

A DPIA must be completed before using footage for training purposes where:

- identifiable individuals appear in the footage and consent has not been obtained and images cannot be obscured;
- the content is contentious, shows use of force, or involves sensitive incidents; or
- the footage will be used as part of a formal, structured training programme.

The DPIA must assess the risks to individuals' rights and freedoms and confirm that use for training is justified, necessary and proportionate. The completed DPIA must be submitted to the Director of Governance Quality and Student Success for sign-off before any training use proceeds.

4.3 Recording

All training use of CCTV footage must be recorded in the HSE 4.4b CCTV Evidence and Access Log, including the footage reference, the training purpose, the date of use, the names of staff who viewed the footage, and whether a DPIA was completed.

5. Footage Access and Disclosure Process

5.1 Routine Access

Access to CCTV footage for routine operational purposes (for example, to review a reported incident) must be:

- requested to the Facilities Manager in writing, stating the purpose and the footage required;
- approved by the Facilities Manager before access is granted; and
- recorded in the HSE 4.4b CCTV Evidence and Access Log, including the name of the staff member, purpose, date and footage reference.

5.2 Subject Access Requests

Where an individual submits a Subject Access Request for CCTV footage in which they appear, the request must be handled in accordance with DIG 2.7 Subject Access Request and Individual Data Rights Policy. The Facilities Manager must:

- identify the relevant footage promptly upon receipt of a verified SAR;
- apply appropriate redaction to protect the images of any other identifiable individuals; and
- ensure the footage is disclosed within the statutory one-month deadline.

The SAR and disclosure must be recorded in the HSE 4.4b log.

5.3 Disclosure to Law Enforcement and Third Parties

A request for footage from the police or another law enforcement body must be:

- received in writing, specifying the purpose, the incident and the footage required;
- reviewed by the Facilities Manager to confirm there is a lawful basis for disclosure; and

- approved by the Director of Governance Quality and Student Success before disclosure is made.

In urgent circumstances where prior approval cannot be obtained (for example, where law enforcement attends the premises), the Facilities Manager may authorise disclosure and must notify the Director of Governance Quality and Student Success within one working day.

All disclosures must be recorded in the HSE 4.4b log.

6. Monitoring and Review

The Facilities Manager is responsible for maintaining the HSE 4.4b CCTV Evidence and Access Log and for completing the annual compliance review in accordance with Section 3.

This procedure must be reviewed every two years in line with HSE 4.4 CCTV Policy, or earlier if required by a legislative change, a significant operational change, or a security incident. The Director of Governance Quality and Student Success is responsible for initiating any review.

7. Linked Documents and External References

This procedure must be read alongside:

- HSE 4.4 CCTV Policy
- HSE 4.4b CCTV Evidence and Access Log
- DIG 2.1 Data Protection and Confidentiality Policy v6
- DIG 2.4 Records Management and Data Retention Policy v3
- DIG 2.7 Subject Access Request and Individual Data Rights Policy v4

External reference points:

- UK General Data Protection Regulation (UK GDPR), Article 5 (data protection principles) and Article 35 (DPIA requirement)
- Data Protection Act 2018
- ICO Guidance on CCTV and Video Surveillance
- Surveillance Camera Code of Practice (Home Office)

8. Version Control Table

Version	Date	Author	Summary of Changes
1.0	May 2026	Pauline Williams	Initial procedure – new document prepared to accompany HSE 4.4 CCTV Policy.