CCTV Policy

POLICY APPROVAL

Approval Required	Indicate with a tick (✓)		**Annual Review Required**	Indicate with a tick (✓)	
	Yes ✓	No		Yes ✓	No
Approval Panel	Loren Janes				
Approved by	Name: Loren Janes		Signature: 	Date: November 2025	
Policy Review Date	November 2026				

Privacy & CCTV Policy

The purpose of this Policy is to regulate the management, operation and use of the CCTV system (Closed Circuit Television) at Futures Changing Ltd. The system comprises 4 fixed cameras located in Colchester. All cameras are monitored from the main offices and images are only available to selected senior staff. This Policy follows Data Protection Act guidelines and is subject to annual review.

This policy outlines how Futures Changing Ltd manages, operates and uses CCTV across our premises. CCTV is used solely for safeguarding learners, staff and visitors, and for the protection of property, in line with:

- Keeping Children Safe in Education (KCSIE) 2025
- ICO CCTV Code of Practice
- Data Protection Act 2018 & UK GDPR

The policy is reviewed annually or sooner if guidance or operational needs change.

Personal Information Collected

The personal information we collect in registering a learner may include:

- Name, address, email address, phone number
- Credit/debit card information
- Language, date of birth, employment information
- Previous examination history, education information
- Identification information
- Signature and photographic image on arrival
- Test responses, scores, and result reports

CCTV

We operate a CCTV surveillance system at Futures Changing. All images and audio recorded remain the property of Futures Changing.
We may supply relevant awarding bodies or external certification providers with footage to validate or identify a particular test or learner.

CCTV System Overview
Futures Changing Ltd operates a CCTV system consisting of:

- 4 active CCTV cameras at our Colchester premises
- A small number of clearly identified dummy cameras, used as a deterrent only; these do not capture footage and are installed transparently to comply with ICO guidance

Active cameras are located in:

- Reception/entry areas
- Hallways and communal areas
- External areas around the building
- Any other safeguarding-relevant location (never in private areas such as toilets)

Purpose of CCTV Use

CCTV is used for:
Safeguarding & KCSIE 2025

- Ensuring learner and staff safety
- Preventing and responding to safeguarding incidents
- Supporting the DSL in investigating behaviour, bullying, trespassing or welfare concerns

- Ensuring safe arrival, departure and movement around the site

Security & Protection

- Preventing and detecting crime, vandalism or unauthorised entry
- Protecting property, vehicles and equipment
- Assisting police investigations where necessary

CCTV will never be used for:

- Staff performance monitoring
- Learner behaviour grading
- Commercial or promotional activities
- Covert surveillance except under police instruction

Transparency & Signage

In line with ICO guidance:

- All CCTV areas have clear and visible signage
- Dummy cameras are labelled as 'Security Monitoring in Operation' to maintain transparency
- The location of cameras is available upon request

Access & Monitoring

Access to live or recorded footage is strictly limited to:

- Director
- Designated Safeguarding Lead (DSL)
- Senior Management Team (SMT) where appropriate

No other staff may access CCTV unless authorised for a specific safeguarding, legal or security purpose.

Storage, Security & Retention

- All footage is stored on a secure, password-protected system
- Access is logged and audited
- CCTV footage is retained for a maximum of 30 days, unless required for:
    - A safeguarding investigation
    - A police investigation
    - A legal or insurance claim

When footage is needed for an investigation, it will be securely retained until no longer required.
Dummy cameras capture no footage and store no data.

Safeguarding, KCSIE 2025 & CCTV

In line with Keeping Children Safe in Education 2025, Futures Changing ensures:

Proportionate Surveillance: CCTV is used only where necessary and never intrusively, balancing safety with privacy expectations for children.

The DSL oversees:

- Use of CCTV in safeguarding investigations
- Proportionality checks
- Compliance with child protection procedures

Data Minimisation
Only relevant footage is viewed, retained or shared.

Privacy Expectations

CCTV will **not** be installed in:

- Toilets
- Changing areas
- Any location where privacy is reasonably expected

Sharing & Disclosure of Footage

Footage may be shared only when legally required or justified:

- Police for crime investigation
- Social Care for safeguarding
- Insurers following an incident
- Courts under legal order

Footage is **never** shared with the media or third parties for non-legal reasons.
All disclosures are logged.

Downloaded Media Procedures

To maintain evidential integrity:

- Footage exports are uniquely identified
- Exported footage is stored securely
- Chain-of-custody logs are maintained
- Only authorised personnel may handle evidence
- Sealed evidence bags are used where required

Data Protection Rights

Individuals have the legal right to:

- Access their personal CCTV images
- Request correction of inaccurate footage
- Request deletion (where lawful)
- Restrict or object to processing
- Request footage be transferred where appropriate

Requests should be made to:
info@changefutures.co.uk
01206 693 152
We respond within one month.

Protection of Credit Card Information

Futures Changing uses a secured transmission method for the electronic transmission of credit/debit card information.

Transmission of Information

The CCTV system will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. Futures Changing will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the Act.

Cameras will be used to monitor activities within FC LTD and its grounds to identify criminal activity actually occurring, anticipated, or perceived. It will be used for the purpose of securing the safety and wellbeing of the learners, staff and training centre together with its visitors.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Images and audio recordings will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment. The planning and design have endeavoured to ensure that the system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible within our policy.

Downloaded Media Procedures

In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any download media used to record events from the hard drive must be prepared in accordance with the following procedures:

- Each download media must be identified by a unique mark.
- Before use, each download media must be cleaned of any previous recording. Details will be recorded including the date and time of download media downloaded including its reference.
- Download media required for evidential purposes must be sealed, witnessed and signed by the Centre Manager, then dated and stored in a separate secure evidence store. If a download media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the Centre Manager, then dated and returned to the evidence stored.
- If download media is archived the reference must be noted.
- Images may be viewed by the police for the prevention and detection of crime.
- A record will be maintained of the release of any download media to the police or other authorised applicants.
- Viewing of images by the police must be recorded in writing.
- Should images and audio recordings be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the download media (and any images contained thereon) remains the property of the training centre and download media (and any images and audio contained thereon) are to be treated in accordance with Data Protection legislation. The centre also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.
- The police may require the training centre to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.
- Applications received from outside bodies will be reviewed by SMT.

How we store your personal information

Your information is securely stored either on a secure protected hard drive or in a locked cupboard if paper registered.

We keep personal details electronically or paper based for up to 2 years dependant on the reason for storing your information. We will then dispose your information by either deleting of all information on file from the hard drives or by having a shredding company come and destroy the paper stored file.

Information is securely stored in line with ICO & GDPR guidelines.

Your data protection rights

Under data protection law, you have rights including:

a) Your right of access - You have the right to ask us for copies of your personal information.
b) Your right to rectification - You have the right to ask us to rectify personal information you think is inaccurate. You also have the right to ask us to complete information you think is incomplete.
c) Your right to erasure - You have the right to ask us to erase your personal information in certain circumstances.
d) Your right to restriction of processing - You have the right to ask us to restrict the processing of your personal information in certain circumstances.
e) Your right to object to processing - You have the the right to object to the processing of your personal information in certain circumstances.
f) Your right to data portability - You have the right to ask that we transfer the personal information you gave us to another organisation, or to you, in certain circumstances.

You are not required to pay any charge for exercising your rights. If you make a request, we have one month to respond to you.

Please contact us at info@changefutures.co.uk or by phone on 01206 693 152 if you wish to make a request.

Complaints

Any complaints in relation to the centre's CCTV system should be addressed to the Director Loren Janes.

Resolution

If you have questions or concerns about this Privacy & Data Protection Policy or how we handle personal information, please contact info@changefutures.co.uk. If we are unable resolve your issue satisfactorily you should contact the ICO.

The ICO's address:

Information Commissioner's Office
Wycliffe House
Water Lane
Wilmslow
Cheshire
SK9 5AF
Helpline number: 0303 123 1113

ICO website: https://www.ico.org.uk