

ELIJAH SOCIAL COGNITIVE SKILLS CENTRE

Dr Debora Elijah PhD MA DEA BSc (Hons)

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CCTV Storage and Recording Policy	
Responsible Committee:	CEO of ESCSC Dr Debora Elijah
Policy Co-ordinator:	Director of ESCSC Nivin Jaber
Date revised:	September 2024
Next review date:	September 2025

Purpose of CCTV Use

The Elijah Social Cognitive Skills Centre (ESCSC) uses Closed-Circuit Television (CCTV) systems for the following purposes:

- **Ensuring the safety and security** of service users, staff, and visitors.
- **Monitoring and deterring criminal activity** within and around the centre.
- **Supporting investigations** into complaints, safeguarding concerns, or incidents involving service users, staff, or visitors.
- **Ensuring compliance** with health and safety procedures and protocols.

CCTV will **never be used** to intrude on the privacy or dignity of individuals unnecessarily, especially in private areas such as bathrooms or bedrooms.

Compliance with Legislation

This policy complies with:

- **UK General Data Protection Regulation (UK GDPR)**
- **Data Protection Act 2018**
- **Human Rights Act 1998**, ensuring the right to privacy is respected.
- **Information Commissioner's Office (ICO) Code of Practice** on CCTV.

Notification and Signage

- Clear signage will be displayed in all areas where CCTV is in operation, informing individuals that CCTV is being used and stating its purpose.
- Service users and staff will be informed upon entry to the centre about the existence of CCTV.
- In private or sensitive areas (such as therapy rooms), **informed consent** will be obtained where possible, especially if footage will be recorded for specific reasons.

Data Collection, Storage, and Retention

- CCTV footage will only be collected for **legitimate purposes** in line with the ESCSC's objectives, and will not be used for any unlawful or intrusive activities.

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- **Retention Period:** CCTV recordings will be stored for a maximum period of **30 days**, unless required longer for an ongoing investigation, complaint, or legal matter.
- Footage no longer required will be **securely deleted** in compliance with data protection regulations.
- Storage systems will be **encrypted and secured**, ensuring only authorized personnel have access to the footage.

Access to Footage

- Access to CCTV footage will be **strictly controlled** and limited to:
 - Senior management.
 - The designated Data Protection Officer (DPO), Nivin Jaber.
 - IT or security staff responsible for system maintenance.
 - Investigators or law enforcement officials where required by law.
- **Third-party access** (e.g., law enforcement) will only be granted under appropriate circumstances and in compliance with legal requirements.
- Individuals who appear in CCTV footage have the right to request access to their personal data under the **Data Subject Access Request (DSAR)** provisions of the UK GDPR. Requests will be processed within **one month** unless special conditions apply.

Monitoring and Use of Footage

- CCTV footage will only be monitored for the purposes outlined above and in **communal areas** such as hallways, entrances, car parks, and offices.
- Footage from private or sensitive areas will only be reviewed in the event of a **specific incident or investigation**.
- Elijah Social Cognitive Skills Centre **does not use CCTV for monitoring staff performance** except in the context of a legitimate investigation or safeguarding concern.

Data Protection and Privacy

- The **Data Protection Officer (DPO)** at ESCSC is responsible for ensuring compliance with data protection laws.
- ESCSC will ensure that any CCTV system complies with the **Data Protection Impact Assessment (DPIA)** process, particularly when introducing new surveillance technology.
- All staff with access to CCTV data will receive **training** on data protection and privacy issues.

Review and Amendments

This policy will be reviewed yearly to ensure its effectiveness and relevance. Amendments to the policy may be made as necessary and all staff should be made aware of the new changes.