



CCTV Policy

ONE Centre

January 2026

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1. Introduction

- 1.1 OUT North East (ONE) has in place a CCTV surveillance system “the CCTV system” across the ONE Centre (OC). This policy details the purpose, use and management of the CCTV system at the OC and details the procedures to be followed in order to ensure that ONE complies with relevant legislation and the current Information Commissioner’s Office CCTV Code of Practice.
- 1.2 ONE will have due regard to the Data Protection Act 2018, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, ONE will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and the 12 guiding principles contained therein.
- 1.3 This policy is based upon guidance issued by the Information Commissioner’s Office, ‘In the picture: A data protection code of practice for surveillance cameras

and personal information'¹ (“the Information Commissioner’s Guidance”).

- 1.4 This policy and the procedures therein detailed, applies to all of ONE CCTV systems including webcams, covert installations and any other system capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

2. CCTV System overview

- 2.1 The CCTV system is owned by OUT North East whose registered address is ONE Centre, Unit 2B Stonehills, Shields Road, Gateshead NE10 0HW and managed by the ONE and its appointed agents.
Under current data protection legislation ONE is the ‘data controller’ for the images produced by the CCTV system. ONE is registered with the Information Commissioner’s Office and the registration number is ZC041956. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner’s guidance.
- 2.2 The Directors are responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 2.3 The CCTV system operates across the ONE Centre with Camera positioned to over entrances and communal areas
- 2.4 Signs are placed at all entrances to the building in order to inform staff, visitors and members of the public that CCTV is in operation. The signage indicates that the system is managed by ONE and a 24 hour contact number is provided.
- 2.5 The Directors are responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- 2.6 Cameras are sited to ensure that they cover ONE premises as far as is possible. Cameras are installed throughout the ONE including reception, Entrance and corridors

¹ <https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

- 2.7 Cameras are not sited to focus on private residential areas and cameras situated in OC focus on entrances and communal areas.
- 2.8 The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.
- 2.9 The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment. Any new CCTV Camera installation is subject to a privacy assessment.

3. Purposes of the CCTV system

The principal purposes of the ONE's CCTV system are as follows:

- 3.1
- for the prevention, reduction, detection and investigation of crime and other incidents;
 - to ensure the safety of staff and visitors;
 - to assist in the investigation of suspected breaches of ONE regulations by staff or visitors
- 3.2 The CCTV system will be used to observe the OC and areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
- 3.3 The ONE seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

4. Monitoring and Recording

- 4.1 Cameras are monitored in the Management Office and remote access by the Directors.

- 4.2 Images are recorded centrally on servers located securely in the ONE server room and are viewable by Directors only. Additional staff may be authorised by the Directors to monitor cameras sited within their own areas of responsibility on a view only basis where required.
- 4.3 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
- 4.4 All images recorded by the CCTV System remain the property and copyright of ONE.
- 4.5 The monitoring of staff activities will be carried out in accordance with Part 3 of the Employment Practices Code.
- 4.6 The use of covert cameras will be restricted to rare occasions, when a series of criminal acts have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of the Directors will be sought before the installation of any covert cameras. The Directors should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.
- 4.7 Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there is reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.

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² https://ico.org.uk/media/for-organisations/documents/1064/the_employment_practices_code.pdf

5. Compliance with Data Protection Legislation

- 5.1 In its administration of its CCTV system, ONE complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Due regard is given to the data protection principles embodied in GDPR. These principles require that personal data shall be:
- a) processed lawfully, fairly and in a transparent manner;
 - b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
 - c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
 - d) accurate and, where necessary, kept up to date;
 - e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed;
 - f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organizational measures.

ONE ensures it is responsible for, and able to demonstrate compliance with GDPR

6. Applications for disclosure of images

Applications by individual data subjects

- 6.1 Requests by individual data subjects for images relating to themselves “Subject Access Request” should be submitted in writing to the ONE Information Compliance Team together with proof of identification. SEND TO: ONE Centre, Unit 2B, Stonehills, Shields Road, Gateshead NE10 0HW
- 6.2 In order to locate the images on the ONE system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.

- 6.3 Where ONE is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

Access to and disclosure of images to third parties

- 6.4 A request for images made by a third party should be made in writing to the Directors .
- 6.5 In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
- 6.6 Such disclosures will be made at the discretion of the Directors, with reference to relevant legislation and where necessary, following advice from ONE Information Compliance Team.
- 6.7 Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or HR Manager/Advisor, the Directors may provide access to CCTV images for use in staff disciplinary cases.
- 6.8 A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Retention of images

- 7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 7 days from the date of recording. Images will be automatically overwritten after this point.
- 7.2 Where an image is required to be held in excess of the retention period referred to in 7.1, the Directors or their nominated deputy, will be responsible for authorising such a request.
- 7.3 Images held in excess of their retention period will be reviewed on a three monthly basis and any not required for evidential purposes will be deleted.
- 7.4 Access to retained CCTV images is restricted to the Directors and other persons as required and as authorised by the Directors.

8. Complaints procedure

- 8.1 Complaints concerning ONE use of its CCTV system or the disclosure of CCTV images should be made in writing to the Directors at: events@outnortheast.org.uk
- 8.2 All appeals against the decision should be made in writing to the Data Controller at events@outnortheast.org.uk.

9. Monitoring Compliance

- 9.1 All staff involved in the operation of the OC CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
- 9.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

10. Policy review

- 10.1 ONE usage of CCTV and the content of this policy shall be reviewed annually by the Directors with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.