



CCTV Monitoring Policy

Policy	reviewed	By whom?
CCTV Monitoring	22/09/2025	Victoria Bacon

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DSL	Victoria Bacon
Contact details	Victoria@pushforward.uk
	0330 8180186

1. Overview

Pushforward uses CCTV to protect the Company's property and to provide a safe and secure environment for employees, young people and visitors to the company's premises. This CCTV Monitoring Policy has been implemented in order to regulate the Closed Circuit Television (CCTV) images being processed in all Pushforward units as well as, where necessary, any in-vehicle dash cam footage when young people are transported. The monitoring and recording images are used for the purposes of crime prevention and detection, as well as public, staff and young people safety.

This policy sets out how Pushforward will collect, use and store CCTV images and audio. For more information on privacy rights associated with the process of personal data collected through CCTV please refer to the Company privacy notice and data protection policy.

This policy applies to all employees and workers, including volunteers as well as anyone visiting or using Pushforward premises.

2. Purpose

Pushforward has carried out a data protection impact assessment and on the basis of the findings consider it necessary and proportionate to install and use a CCTV system. The data collected from the system will assist in a number of security measures including:

- Prevention or detection of crime or malpractice
- Identification and prosecution of offenders
- Monitoring the security of the our premises and equipment
- Ensuring that Health & Safety rules and company procedures are complied with
- Identification of unauthorised actions or unsafe working practices that might result in disciplinary investigations and to assist in providing relevant evidence
- Promoting productivity and efficiency
- The safety and welfare of our young people
- The safety and welfare of our staff, subcontractors and visitors

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Should, during monitoring relating to any of the above, any images or audio that raise concerns of staff misconduct become apparent this will be investigated and dealt with in accordance with the disciplinary policy if appropriate.

3. Safeguarding young people

One of the purposes of CCTV monitoring will be keeping young people safe whilst in the care of Pushforward.

Although CCTV is in operation employees still have an obligation to share with their manager or Pushforwards Designated Safeguarding Lead any information which gives rise to concern about the safety or welfare of a young person.

Under no circumstances are adult staff, visitors or volunteers to enter/establish an inappropriate relationship with a student within Pushforward, irrespective of age. Teaching, Administrative and Support staff are in a position of trust with all of our children, whatever their age, and breaking that trust is forbidden by law. Your conversation with children needs to use appropriate language and be contained within appropriate boundaries. If you suspect a child or other adult is becoming unreasonably attentive to you, please notify the Senior Leadership Team immediately and seek appropriate support.

CCTV footage (along with any accompanying audio) can be reviewed and used as evidence to assist in investigating any allegation made against a member of staff or young person where an incident occurs.

4. Safeguarding employees

CCTV will also be used for the purposes of keeping employees safe whilst working at Pushforward.

CCTV footage (and audio if relevant) can be reviewed and used as evidence to assist in investigating any allegation made against a member of staff or young person where an incident occurs.

5. Location

CCTV monitoring is active constantly in all Pushforward units for the purpose of security of the premises and security of equipment contained in those premises. It is also used to monitor visitors to the units for the security and safety of our employees and young people.

Cameras are located at strategic points through the premises, principally at the entrance and exits and in core areas used for the purposes of education. No CCTV cameras will be in any toilets or changing areas.

All cameras are clearly visible, and appropriate signs are displayed so that employees, young people and visitors are aware they are entering an area covered by CCTV.

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6. Recording & Retention of Images

Images and audio produced by CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it working properly and that the media is producing high quality images.

Images and audio may be recorded either in a constant real-time (24hrs a day throughout the year) or only at certain times, as deemed necessary. The images that are filmed are recorded and held securely in the cloud.

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected. Footage is only available to certain employees, as deemed appropriate to their role and will be kept confidential at all times. Images and audio will only be made available to others when circumstances require this for example; work related checks, investigation evidence, police requests or safeguarding purposes. The Directors of the company are the only people permitted to authorise disclosure of images to third parties. All requests for access to images will be documented, including the date of disclosure, to whom the images have been provided, the reasons required. If disclosure is denied, the reason will be recorded. (Please see our Data Protection Policy for individual rights to access)

Live and recorded footage may be viewed at anytime by the appropriate approved employees for the purposes of safeguarding, security and other work-related matters as detailed in this policy or in our Data Protection policy.

In normal circumstances recordings are retained for 12 months before being deleted, however where a law enforcement agency is investigating a crime or a disciplinary process is in progress, images may need to be retained for a longer period.

Pushforward are aware that covert recording can only be done in exceptional circumstances (eg where we suspect criminal activity). On this basis we will only undertake covert monitoring if a data protection impact assessment has been carried out which has addressed the following:

- The propose of the covert recording
- The necessity and proportionality of the covert recording
- The time parameters for conducting the covert recording
- The safeguarding and or security measure that need to be put in place to ensure the cover recording is conducted in accordance with the data protection laws, including GDPR.

Any covert recording will only take place with a Directors approval and for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular activity. Once the specific investigation has been completed, covert monitoring will cease.

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7. Use of images & Audio

Footage from CCTV can be used to monitor and ensure Health & Safety and company procedures are complied with along with identification of unauthorised actions or unsafe working practices that might result in a risk to the company, young people or employees. In cases of monitoring for these purposes identifying acts of misconduct footage and audio may be used as part of an investigation or disciplinary action.

8. Data Protection

Pushforwards' Data Protection Officer is responsible for the implementation of and compliance of this policy and the operating of the CCTV system and will conduct a regular review of the use and processing of CCTV images and ensure that all times it remains compliant with the laws regarding data protection and privacy. Any complaints or enquiries should be addressed to the Data Protection Officer.

Pushforward will process the personal data collected in connection with operation of CCTV Policy in accordance with our Data Protection Policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of this data will constitute as a breach and should be reported immediate to the Company Data Protection Offer. Reported data breaches will be investigated and may lead to disciplinary action being taken.

9. ICO

As a registered member of the Information Commissioners Office we follow the expectations for CCTV as per their advice and guidance.

https://icosearch.ico.org.uk/s/redirect?collection=ico~sp-search&url=https%3A%2F%2Fico.org.uk%2Ffor-organisations%2Fuk-gdpr-guidance-and-resources%2Fcctv-and-video-surveillance%2F&auth=XPnO5kQZoinbT0McErnu0w&profile=_default&rank=1&query=cctv+policy