

## **CCTV POLICY**

Role Group Ltd / Role Training Ltd CCTV Policy is intended for the use of the CITB Exam Testing Room only. We are committed to complying with our legal obligation to appropriately handle and protect Personal Data and ensure that the legal right of employees and delegates.

This policy is intended to enable employees and delegates to understand how Role Group Ltd / Role Training Ltd uses CCTV and departments / Person(s) responsible for the CCTV use, the rights individuals have in relation to the CCTV, who has access to CCTV images and how individuals can raise any queries or concerns they have.

### **Definitions**

**CCTV** – camera devices or systems including fixed CCTV that capture information of identification of the employees/delegates or information relation to identification.

**CCTV Data** – any data in respect of CCTV. Video images etc. (No live recordings or sounds)

**Data** – any information which is stored electronically or in paper – based filing system.

**Data Subject** – any individuals who can be identified directly or indirectly from CCTV Data. Data include employees, delegates.

**Data Controller** – Organisation or authority which determines how and for what purposes for Personal Data are processed. When operating CCTV, Role Group Ltd / Role Training Ltd is the relevant Data controller and is responsible for ensuring compliance with the Data Protection Law.

**CCTV Users** – are our employees (or employees of any Data Processors which we appoint) whose work involves processing CCTV Data. This will include those whose duties are to operate CCTV to record, monitor, store, retrieve and delete images. Data users must protect the CCTV Data they handle in accordance with this policy.

### **Data Protection Laws**

a) Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data (General Data Protection Regulation) (the “GDPR”) and any equivalent or implementing legislation;

b) all other applicable laws, regulations or court judgements relating to the processing of personal data, data privacy, electronic communications, marketing and/or data security; and

c) any and all legally binding guidelines, recommendations, best practice, opinions, directions, decisions, or codes issued, adopted or approved by the European Commission, the Article 29 Working Party, the European Data Protection Board, the UK’s Information Commissioner’s Office and/or any other supervisory authority or data protection authority from time to time in relation to the processing of personal data, data privacy, electronic communications, marketing and/or data security;

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in each case as from time to time in force and as from time to time amended, extended, consolidated, re-enacted, replaced, superseded or in any other way incorporated into law and all orders, regulations, statutes, instruments and/or other subordinate legislation (including the Data Protection Bill 2017 when in force) made under any of the above in any jurisdiction from time to time

**Processing:** is any activity which involves the use of CCTV Data, whether or not by automated means. It includes collecting, obtaining, recording or holding CCTV Data, or carrying out any operation or set of operations on the CCTV Data including organising, structuring, amending, retrieving, using, disclosing or erasing or destroying it. Processing also includes transferring CCTV Data to third parties.

**Site:** Role Group Ltd / Role Training Ltd is the sole site – (in CITB Training Room/Reception and Communal Hallway).

### **About this policy**

We currently use CCTV to view and record delegates of whom are carrying out CITB Testing under strict exam conditions with an invigilator present/or viewing CCTV to ensure that no fraudulent activity.

This policy sets out why we use CCTV, how we will use CCTV and how we will process any CCTV Data recorded by CCTV to ensure that we are compliant with Data Protection Law.

The images of employees/delegates recorded by CCTV are Personal Data and therefore subject to the Data Protection Laws. Role Group Ltd / Role Training Ltd is the Data Controller of all CCTV Data captured at our Site.

This policy covers all delegates who attend site to carry out CITB Testing under strict Exam conditions.

### **Staff responsible**

David McHugh – Managing Director has overall responsibility for ensuring compliance with Data Protection Laws and the effective operation of this policy. Day-to-day operational responsibility for CCTV. Should you have any queries on the use of CCTV or surveillance systems by contact us in writing to Role Group Ltd / Role Training Ltd, Unit 3 James Yard, 480 Larkshall road, Highams Park, London, E4 9UA FAO David McHugh – Managing Director.

### **Why we use CCTV**

We currently use CCTV within Role Group Ltd / Role Training Ltd – CITB - ITC Testing Room/Reception and Communal Hallway. We believe that such use is necessary for the following legitimate business purposes:

### **CITB - ITC Testing – Under Strict Exam Conditions**

**This room is also used for NSAR Training as and when required**

## **MONITORING**

The locations of the CCTV specifically is located in the CITB Training Exam Room to minimise the viewing of spaces/individuals which are not relevant to the legitimate purpose of the monitoring as specified above.

A live feed from the CCTV is monitored with sound quality when Exams are taking place and images are only revisited in the event of an incident or if a request is made.

Any staff using CCTV will be given training to ensure that they understand and observe the legal requirements relating to the processing of any Data gathered.

### **How we operate CCTV**

Where CCTV is in use, we will ensure that signs are clearly displayed at the entrance of the surveillance zone to alert Delegates and employees that their image may be recorded.

We will ensure that live feeds from the CCTV are only viewed by appropriately authorised staff whose role requires them to have access to such CCTV Data. Recorded images will only ever be viewed at allocated screens by our Office Manager/Managing Director.

### **How we use the Data**

To ensure that the rights of individuals recorded by our CCTV are protected, we will ensure that CCTV Data gathered from such systems is stored in a way that maintains its integrity and security. This may include encrypting the Data, where it is possible to do so.

We will ensure that any CCTV Data is only used for the purposes specified. We will not use CCTV Data for another purpose unless permitted by Data Protection Laws.

Where we engage Data Processors to process Data on our behalf, we will ensure contractual safeguards are in place to protect the security and integrity of the Data.

### **Retention and erasure of Data**

Data recorded by our CCTV will be stored locally on servers at our site.

We will not retain this Data indefinitely but will permanently delete it once there is no reason to retain the recorded information.

CCTV Data will be retained for a minimum of 30 days according to the purpose for which it was recorded. For example, where images are being recorded for fraudulent prevention purposes, CCTV Data will be kept only for as long as it takes to establish that an exam fraud has been committed, the images will be kept until the process is completed. In all other cases, recorded images will be kept for no longer than 30 days before being overwritten and permanently deleted.

At the end of its useful life and in any event within 7 years all Data stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs or hard copy photographs will be promptly disposed of as confidential waste.

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It shall be prohibited for any system operator to download or screenshot any recorded images without written or authority of the Managing Director.

### **Ongoing review of our use of CCTV**

We will periodically review our ongoing use of existing CCTV at our site to ensure that its use remains necessary and appropriate and in compliance with Data Protection Laws.

We will also carry out checks to ensure that this policy is being followed by all employees.

### **Rights of Data Subjects**

As CCTV Data will identify individuals, it will be considered Personal Data under applicable Data Protection Laws. Under Data Protection Laws, Data Subjects have certain rights in relation to the Personal Data concerning them. These are as follows:

- (a) the right to access a copy of that Personal Data and the following information (this may include CCTV Data captured by our CCTV):
  - (i) the purpose of the processing;
  - (ii) the types of Personal Data concerned;
  - (iii) to whom the Personal Data has or will be disclosed; and
  - (iv) the envisaged period that the Personal Data will be stored, or if not possible, the criteria used to decide that period;
- (b) the right to request any inaccurate Personal Data that we hold concerning them is rectified, this includes having incomplete Personal Data completed;
- (c) the right to request the Personal Data we hold concerning them is erased without undue delay, where it is no longer necessary for us to retain it in relation to the purposes it was collected;
- (d) the right to request restriction of our processing of Personal Data in certain circumstances; and
- (e) the right to lodge a complaint with the Information Commissioner's Office, if the Data Subject considers that our processing of the Personal Data relating to him or her infringes Data Protection Laws.

### **SERVICE PROVIDERS**

In order to operate CCTV across our Exam Room/Reception and Communal Hallway we appoint MapIT to monitor and service our CCTV System.

### **Requests of disclosure by third parties**

No images from our CCTV cameras will be disclosed to any third party, without express permission being given by Managing Director. Data will only be disclosed to a third party in accordance with Data Protection Laws.

In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

### **Complaints**

If any member of staff has questions about this policy or any concerns about our use of CCTV, then they should speak to Louise Morley – Quality/Compliance Manager or alternatively write to [training@rolegroup.co.uk](mailto:training@rolegroup.co.uk)

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Where this is not appropriate or matters cannot be resolved informally, employees should use our formal grievance procedure. If you are not an employee, you can use our official complaints procedure.

The arrangements in place to implement this policy form part of the company's day-to-day operational procedures, and as such are reviewed on a continuous basis. Where opportunities for improvement in safety standards or safety problems are identified they will be tackled promptly, and with sufficient resources, to ensure that they are adequately dealt with. The implementation of this policy will be monitored throughout the company's activities in order to ensure compliance with its objectives.

This policy statement will be formally reviewed on an annual basis.

Signed: 

Role: David McHugh - Managing Director  
Date: June 2025