

# CCTV Policy

Document Owner:	SELT Concession Manager (SELT CCTV) Chief People & Culture Officer (non-SELT CCTV)
Classification:	Public
Document Identifier:	CCTV Policy
Internal/External use:	External
Approval:	Policy Management Group
Document Status:	Final
Version:	1.1
Date Issued:	23 January 2023
Last Review:	23 March 2026
Last Modified:	23 March 2026
Next Review:	23 March 2028

This document is intended for Trinity College London (TCL) personnel and authorised external parties. This document must be handled in accordance with the TCL classification policy

# CCTV Policy

Printed copy of this document is uncontrolled and should not be relied upon as the most up to date version.

## Table of Contents

Overview .....	3
Aims of the policy.....	3
Scope.....	3
Risks and consequences of breach .....	3
Rationale for permitted uses of CCTV.....	3
Location and visibility of cameras.....	4
Access.....	4
Covert Monitoring.....	5
Retention .....	5
ICO registration.....	5
Other relevant policies.....	6
Procedures to be followed.....	6
Data protection.....	6
Change History .....	6
Change Approval.....	7

## Overview

Trinity believes that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all its staff and visitors at its offices and SELT centres and to support the security of its tests. However, Trinity recognises that this may raise concerns about the effect on individuals and their privacy.

Trinity currently uses CCTV cameras with audio recording to view and record candidates taking Secure English Language Tests (SELTs) at its SELT Centres. As an incidental consequence of the installation of these cameras, CCTV footage of other individuals in or around Trinity's SELT Centres may be captured as well. Trinity has also positioned CCTV cameras at 7<sup>th</sup> Floor, 22 Upper Ground, London, (Trinity's "Head Office"), for security reasons.

Images and sound recorded by surveillance systems are personal data which must be processed in accordance with data protection laws. Trinity is committed to complying with its legal obligations and ensuring that the legal rights of individuals recorded by surveillance systems at its SELT centres and Head Office are recognised and respected.

## Aims of the policy

- To outline why Trinity uses CCTV, how Trinity will use CCTV and how Trinity will process data recorded by CCTV cameras to ensure Trinity is compliant with data protection law and best practice.
- To ensure transparency around the effects on individual privacy of Trinity's use of CCTV.

## Scope

This policy applies to:

- All Trinity employees and other workers, including contractors and agency or temporary workers.
- All consultants and other service providers.
- Candidates taking Trinity SELT exams.
- Other visitors at Trinity SELT centres and Head Office.

## Risks and consequences of breach

Legal, regulatory and/or disciplinary action.

## Rationale for permitted uses of CCTV

Trinity use of CCTV in SELT centres is permitted only for the following reasons:

- To provide a safe and secure environment for staff and visitors at Trinity's SELT centres.
- To provide evidence if needed to assist the SELT Security Manager with an investigation into an exam session.
- To provide a deterrent to candidates considering fraudulent activity.

- To provide evidence that the person in the exam room is the same person that registered for the test.
- To support law enforcement bodies in the prevention, detection and prosecution of crime.

Trinity's use of CCTV in SELT centres is a requirement of the Home Office which has contracted Trinity to provide SELT exams.

Should issues of concern arise from the CCTV footage in SELT centres, Trinity may take action in respect of:

- relevant candidates (including referral to the Home Office); and
- relevant Trinity employees, including identifying a need for additional training, disciplinary action, or referral to the Home Office, as appropriate.

Trinity use of CCTV in its Head Office is permitted only for the following reasons:

- To provide a safe and secure environment for staff and visitors .
- To enhance the security of Trinity's Head Office, facilities, and critical infrastructure.

Should issues of concern arise from the CCTV footage in its Head Office, Trinity may take action in respect of:

- relevant Trinity employees, workers and contractors, including identifying a need for additional training or disciplinary action; and
- service providers and/or visitors, including additional consultation or escalation.

### **Location and visibility of cameras**

Cameras are located at strategic points throughout Trinity's SELT centres and Head Office. Trinity seeks to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. Trinity does not locate cameras in areas where individuals may have a reasonable expectation of privacy.

Trinity ensures that cameras are clearly visible and that appropriate signs are displayed prominently so that all candidates, employees and visitors are made aware that they are entering an area covered by CCTV.

### **Access**

Personnel who may access the CCTV and audio footage will be limited, on a need-to-know basis, specifically:

- The Trinity SELT Security Manager and SELT management will have access to view (in real time) and review footage as part of their standard security checking of test delivery. Trinity employees engaged in running SELT test centres will also be able to do so, only in respect of the centre or centres which they run.

- The Trinity People & Culture team may access to the footage for investigative purposes as part of a disciplinary, grievance or health and safety investigation process.
- The Trinity IT Infrastructure Manager (or their delegate) and the IT Operations Team may access the footage to provide internal assistance and troubleshooting on the CCTV technology, and to carry out monitoring and checks where the footage relates specifically to IT security.
- The Home Office will have access to the SELT CCTV footage upon request.
- Relevant authorities (such as the police) may have access upon completion of relevant legal formalities for requesting access, for law enforcement purposes.
- The footage will be monitored regularly by Trinity SELT Security, SELT management and, on occasion, by Home Office staff.

### **Covert Monitoring**

Covert monitoring (where the individual is not aware the monitoring is taking place) will only be justifiable in exceptional circumstances where there are grounds to suspect criminal activity or extremely serious malpractice.

In the rare instances where it is considered justified, it will only be carried out with the express authorisation of the General Counsel and the Chief People & Culture Office (CPCO). Authorisation will only be given in instances where criminal activity or extremely serious malpractice is suspected. The decision to carry out covert monitoring will :

- be fully documented and will set out how the decision to use covert monitoring was reached and by whom;
- be supported and documented by a Data Protection Impact Assessment (DPIA);
- clearly define the scope, duration, purpose of the monitoring and those people involved; and
- be strictly time-limited and subject to regular review.

The risk of intrusion on individuals not connected with the matter under investigation will always be a primary consideration in reaching any such decision.

### **Retention**

Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once it is decided that there is no reason to retain the recorded information. Please refer to Trinity's Data Retention Policy and the Data Retention Schedule for further information on the period for retention.

### **ICO registration**

Trinity has been registered with the ICO since 2003. Trinity's data controller number is Z8146688. Trinity's notification to the ICO includes 'the use of CCTV for the prevention of crime'.

**Other relevant policies**

[Data Retention Policy](#)

[Data Retention Schedule](#)

[Data Destruction Policy](#)

**Procedures to be followed**

CCTV Procedure

**Data protection**

Data subjects may make a request for disclosure of their personal information and this may include CCTV images. Please visit [Trinity’s Data Subject Access Request page](#) should you wish to make a request.

In the case of CCTV and audio of candidates taking SELT exams, Trinity is the data processor, and Trinity will notify the Home Office (the data controller) of any Subject Access Request Trinity receives.

In order for Trinity to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

Please note that a subject access request can only be made in respect of requester’s own personal data. If other persons are featured in the recording, their personal data must be protected. In addition, under data protection laws Trinity is not required to provide personal data consisting of information recorded by candidates during exams and/or in circumstances where its release would adversely affect Trinity’s rights in the intellectual property and confidentiality of its exams. Accordingly, where necessary for these reasons, Trinity may withhold or obscure images of third parties in CCTV data when responding to a subject access request.

**Change History**

The following changes have been made to this document:

Version	Date	Author	Change Summary
1.0	23 January 2023	Legal Team	This version 1 of this policy is the original version in this format. It supersedes the CCTV Policy dated 20 September 2019 in the previous format.
1.0	13 March 2024	Legal Team	Reviewed. No material changes made.
1.1	23 March 2026	Legal Team	Scope of CCTV use cases, permissions and responsibilities changed.

## Change Approval

The changes to this document have been approved by the following personnel:

Version	Date	Approver
1.0	25.03.24	Policy Management Group
1.1	23.03.26	Policy Management Group