

TITLE	CLOSED CIRCUIT TELEVISION (CCTV) POLICY FOR SELT CENTRES
Policy Objective	<p>We currently use CCTV cameras with audio recording to view and record candidates taking Secure English Language Tests (SELTs) at our SELT Centres. We believe that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all our staff and visitors at our SELT centres and to support the security of our tests. However, we recognise that this may raise concerns about the effect on individuals and their privacy. This policy is intended to address such concerns.</p> <p>Images recorded by surveillance systems are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring that the legal rights of individuals recorded by surveillance systems at our SELT centres are recognised and respected. This policy is also intended to assist staff in complying with their own legal obligations when working with personal data.</p>
About this Policy	<p>This policy outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice.</p> <p>The policy applies to:</p> <ul style="list-style-type: none"> • All Trinity employees, contractors, agency or temporary workers • All consultants and other service providers, including examiners, engaged in the development, delivery and award of Trinity exams • Candidates taking Trinity exams as SELTs and other visitors at our SELT centres <p>Trinity employees should note that a breach of this policy may, in appropriate circumstances, be regarded as misconduct leading to disciplinary action, up to and including dismissal. Likewise, CCTV recorded data showing them to be acting in breach of their contract of employment may be used in disciplinary proceedings against them.</p>
Reasons for CCTV	<p>The use of CCTV at Trinity SELT Centres has a number of purposes:</p> <ul style="list-style-type: none"> • To provide a safe and secure environment for staff and visitors at our 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

	<ul style="list-style-type: none"> • 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
Location and visibility of cameras	<p>Cameras are located at strategic points throughout all SELT Centres We will seek to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring.</p> <p>We will ensure 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.</p>
Recording and storage of CCTV with Audio Recording	<p>The daily CCTV recordings (per camera) are stored on the local server (ASF format) in each SELT centre and backed up on a central storage. These recordings will be transferred to the central storage via VPN (secure internet transfer) to the above mentioned central storage.</p>
Access to CCTV with Audio Recording	<p>The Trinity SELT Security Manager and SELT management/HR will have access to review an appropriate proportion of videos as part of their standard security checking of Test delivery. The Home Office will also have access upon request.</p>
Monitoring of CCTV with Audio Recording	<p>The recorded material will be monitored regularly by Trinity SELT Security, SELT management and, on occasion, by Home Office staff.</p>
Covert monitoring	<p>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.</p> <p>In the rare instances where it is considered justified, it will only be carried out with the express authorisation of Group Director, Quality and Standards or their nominee. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom.</p> <p>The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision. Furthermore, only limited numbers of people will be involved in any covert monitoring; and the covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.</p>
Retention of CCTV with Audio Recording	<p>Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Please refer to our Data Retention Policy and the</p>

	Data Retention Schedule for further information on the period for retention.
Rights of access to your personal information	<p>Data subjects may make a request for disclosure of their personal information and this may include CCTV images. Please use Trinity's Subject Access Request form should you wish to make a request.</p> <p>In order for us 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</p> <p>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 we are not required to provide personal data consisting of information recorded by candidates during exams and/or in circumstances where its release would adversely affect our rights in the intellectual property and confidentiality of our exams. Accordingly, where necessary for these reasons, we may withhold or obscure images of third parties in CCTV data when responding to a subject access request.</p>
Licensing of CCTV with Audio Recording	Trinity has been registered with the ICO since 2003. Trinity's data controller number is Z8146688. Our notification to the ICO includes 'the use of CCTV for the prevention of crime'.
Effective Date	20 September 2019
Date of next review	20 September 2020