



Here for young people
Here for communities
Here for you

CCTV Procedure

March 2026



Everyone should have a fair chance to discover who they are and what they can become.

About YMCA Newark and Sherwood

YMCA Newark and Sherwood believes in fairness and opportunity. There are essential building blocks for a full and rewarding life: a safe home; acceptance; guidance; friendship; physical and mental health; academic support; employment skills; and access to real opportunities. Many young people have never known these things; other people have lost one or more as they grew up, but we all need them. All of us. At YMCA, we provide these critical foundations for a fresh, strong start for young people and a better quality of life in the community.

Version History

Version No.	Date Completed	Section(s)	Description of change(s)
1	13/02/2026		

CCTV Procedure Plan – YMCA Newark and Sherwood (YMCANS)

1. Purpose

This procedure plan sets out how YMCANS will operate, manage, and monitor CCTV systems in line with the YMCA Robin Hood Group CCTV Policy, UK GDPR and Data Protection Act 2018.

2. Scope

This procedure applies to YMCANS premises where CCTV is installed, including nursery, youth programming, climbing centre, outdoor sports facilities, café, function suite, and communal areas. It covers overt CCTV systems only.

3. Pre-Installation Procedure

1. Identify a safeguarding, security, or safety need.
2. Confirm CCTV is necessary and proportionate, and that no less intrusive option is suitable.
3. Complete a Data Protection Impact Assessment (DPIA).
4. Obtain approval from the Director of Estates & Compliance and Executive Director YMCA Newark and Sherwood.
5. Record camera details in the CCTV Asset Register.
6. Install clear signage across the Community Activity Village, signifying usage of CCTV.

4. Camera Location & Use

- Cameras may only cover entrances, exits, communal and public areas.
- Cameras must never be installed in private or high-expectation-of-privacy areas (e.g. toilets, bedrooms, changing areas).
- Camera positioning must minimise unnecessary intrusion into neighbouring or non-YMCA spaces.
- CCTV must not be used for staff performance monitoring except where part of a formal investigation
- CCTV is used to support safeguarding and security. CCTV must not be used for staff performance monitoring except where part of a formal investigation.

5. System Operation

- CCTV systems record visual images only.
- Systems operate continuously unless otherwise authorised.
- Image quality must be sufficient for identification purposes.
- Footage is stored on secure, access-controlled systems and access is limited to the nominated Data Controller (Head of Member Services) and secondary support officer (Head of Programmes), Group IT Manager and External IT Support (Bear IT). In any case the above aren't available the following Contingency authorised users can access CCTV to support; Executive Director, YMCA Newark and Sherwood and Assistant Operations Manager, Early Years and Childcare.

6. Access to CCTV Footage

1. Only Authorised Viewers may access live or recorded footage.
2. Access must relate to a legitimate purpose (safeguarding, incident investigation, crime prevention and staff misconduct).
3. Viewing must take place in a private, secure area.
4. Complete the CCTV Access Log for every viewing or export.
5. Footage must never be shared informally or discussed outside authorised channels.
6. Login credentials must be securely stored and accessible only to two designated authorised users at any one time.

7. Exporting & Retaining Footage

- Standard retention is 28 days (31 days for licensed premises).
- Where footage is evidential, a lawful basis must be identified and verified before footage is disclosed to any person, including third parties and internal teams to support with requests such as RIDDOR's. All footage should be;
 - Exported securely
 - Labelled with date, time, location, and reason
 - Stored separately with restricted access
- Delete footage once it is no longer required.
- Extended retention requires written justification or police request.

8. Disclosure Procedure

Law Enforcement

1. Request must be in writing and state legal authority.
2. Verify identity of requesting officer.
3. Log disclosure details.

Other Third Parties

1. Obtain written authorisation from the Executive Director, YMCA Newark and Sherwood.
2. Confirm lawful basis for disclosure.
3. Log disclosure and securely transfer footage.

9. Data Subject Access Requests (DSARs)

1. All requests must be forwarded immediately to YMCA Robin Group's DPO using the email address dp@ymcarhg.org.
2. The DPO will manage the DSAR request and will contact you to locate the relevant footage using a provided date time and location
3. The DPO will respond within one calendar month but may extend this period by another two calendar months if legal reason exists.
4. The DPO is responsible for ensuring that footage containing third parties may require blurring or redaction.

YMCA Robin Hood Groups Data Protection Officer is Hayley Sanders, dp@ymcarhg.org

10. Breach Management

- Any unauthorised access, loss, or disclosure must be reported to the DPO immediately and no later than 24 hours once discovered.
- Preserve evidence and restrict further access.
- Cooperate fully with investigation.
- Follow corrective actions and training requirements.

11. Covert Surveillance (Exceptional Only)

- Must not be initiated by local teams.
- Requires:
 - DPIA
 - Written senior authorisation
 - Defined time limits
- Managed centrally by senior leadership only.

12. Training & Awareness

- Authorised Viewers must complete mandatory CCTV and data protection training. This is to be completed every 2 years, with a training log maintained. Training must include recognising inappropriate requests, privacy risks, and redaction processes.
- Refresher training provided annually or following policy changes.
- All staff informed of CCTV presence via induction alongside updates via email and company notice board (Robin Hub).

13. Monitoring & Review

- Monthly system checks logged and faults escalated to Estates and Compliance, YMCA Robin Hood Group.
- Annual professional maintenance review.
- Annual policy and procedure review by DPO, Executive Director - YMCA Newark and Sherwood, Head of Member Services, Head of Programmes and Director of Estates and Compliance, YMCA Robin Hood Group.
- Review of DPIA following any environmental change (e.g camera positioning)

14. Accountability

- **Data Controller:** Head of Member Services
- **DPO:** Oversight, DSARs, breaches
- **System Manager:** Technical operation and compliance
- **Managers:** Day-to-day adherence at site level

15. Related Documents

- YMCA Robin Hood Group CCTV Policy
- Data Protection Policy
- Privacy Notice
- Safeguarding Policy
- Staff Code of Conduct
- Disciplinary Policy and Procedure
- Grievance Procedure

16. Fair Usage Examples

The examples below outline usage examples (not all) and how the process is internally operated; .

Risk Level	Low	Low/Medium	Medium/High	High
Example 1	Manager asks to view CCTV to check if session is set out correctly.	Near Miss Reported – Slip / Trips and Falls.	Parent makes a complaint within the nursery of conduct of the nursery staff.	High level safeguarding concern; staff to child / child to child or violence.
How to request access to CCTV	Ticket system	Ticket system	Ticket system	Ticket system
Fair Access	No	No	Yes	Yes
Recommended Steps	Refresher training the nominated manager on fair access / CCTV policy.	Refresher training the nominated manager on fair access / CCTV policy. Internal review on steps that led to incident and review of internal practice to mitigate risk.	Ticket filed, Head of Member Service to review footage and log access to the footage. Head of Member Services to share update with manager / team member who filed the ticket. Complaints procedure to be followed with update to parent on whether the complaint is upheld	Ticket filed and My Concern logged. Head of Member Services to review footage and log access to the footage. Head of Member Services to share update with manager / team member who filed the ticket. Head of Safeguarding and Compliance to escalate with support of Head of



			or not. Assistant Operations Manager – Early Years and Childcare to review operations if any learnings from complaint is to be implemented.	Programmes. Police/Local Authority Designated Officer to be informed (staff to child incident).
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