



# PRIVACY NOTICE FOR CCTV AND VISITORS

(Applies only in services where CCTV is installed)

Applies to Aspirations Care Ltd. and Aspirations (SL) Ltd.

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## 1. Introduction

Aspirations Care Ltd. and Aspirations (SL) Ltd. (herein after referred to as “Aspirations”, “we”, “us”, “our”) are committed to protecting your personal data and respecting your privacy.

This Privacy Notice explains how we collect, use, store, share, and protect personal data relating to **visitors, staff, contractors, and others who enter Aspirations services or premises where Closed-Circuit Television (CCTV) systems are in operation.**

**This notice applies only to services or premises where CCTV is installed.** Not all Aspirations locations operate CCTV systems. Clear signage is displayed at all locations where CCTV is in use.

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## 2. What Is Personal Data?

Under the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018, **personal data** means any information relating to an identified or identifiable individual.

In the context of CCTV, this includes:

- Video images of individuals
- Still images captured from CCTV footage

- Associated records such as incident logs or access records linked to CCTV footage
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### 3. Who Is Responsible for Your Personal Data?

Aspirations is the **data controller** for personal data processed through CCTV systems at its services and premises.

We process personal data in accordance with:

- The UK GDPR
  - The Data Protection Act 2018
  - Guidance issued by the Information Commissioner's Office (ICO)
  - Relevant health, safety, and safeguarding legislation
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### 4. Our Legal Basis for Using CCTV

We only operate CCTV where the law allows us to do so and where its use is necessary and proportionate.

#### Article 6 UK GDPR - General Personal Data

We rely on one or more of the following lawful bases:

- **Article 6(1)(c) - Legal Obligation**  
Where CCTV supports compliance with health and safety, safeguarding, or regulatory requirements.
- **Article 6(1)(e) - Public Task**  
Where CCTV supports the delivery of regulated health and social care services in the public interest.
- **Article 6(1)(f) - Legitimate Interests**  
Where CCTV is necessary to protect people we support, staff, visitors, and property, and to prevent, detect, or investigate incidents, provided these interests are not overridden by individual rights and freedoms.

We do **not** use CCTV for continuous monitoring of individuals and do not use it in private areas such as bedrooms or bathrooms.

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## 5. Why We Use CCTV

Where CCTV is installed, it may be used for the following purposes:

- To promote the safety and wellbeing of people we support
- To protect staff, visitors, and contractors
- To deter and detect crime, abuse, or anti-social behaviour
- To assist with safeguarding investigations
- To support health and safety monitoring
- To investigate incidents, accidents, or complaints
- To protect property and assets

CCTV is not used for routine staff performance management.

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## 6. Where CCTV Is Used

CCTV may be installed in:

- External areas (e.g. building entrances or car parks)
- Communal internal areas (e.g. hallways or shared spaces)

CCTV is **not** installed in private living spaces, including:

- Bedrooms
  - Bathrooms
  - Toilets
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## 7. Who May Be Recorded

Depending on the location, CCTV may capture images of:

- People we support
  - Visitors
  - Staff
  - Contractors
  - Members of the public entering monitored areas
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## 8. Who Has Access to CCTV Footage

Access to CCTV footage is strictly controlled.

Footage may be accessed by:

- Authorised Aspirations staff
- Safeguarding or compliance teams
- Law enforcement agencies (where lawfully required)
- Regulatory bodies such as the Care Quality Commission (CQC)

Access is limited to those who need the footage for legitimate and lawful purposes.

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## G. How We Share CCTV Footage

We may share CCTV footage where lawful and necessary with:

- Police or law enforcement agencies
- Local Authorities or safeguarding partners
- Regulatory bodies (including the CQC)
- Legal advisors or insurers

We only share footage that is relevant, proportionate, and necessary.

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## 10. How Long CCTV Footage Is Kept

CCTV footage is retained for a **limited period**, typically:

- Up to **30 days**

Footage may be retained for longer where:

- It is required for an investigation
- It forms part of a safeguarding concern
- It is needed for legal or insurance purposes

Once no longer required, footage is securely deleted.

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## 11. Your Rights Under Data Protection Law

You have the right to:

- Be informed about how your personal data is used
- Request access to CCTV footage showing you (Subject Access Request)
- Request correction of inaccurate information
- Request erasure of footage in certain circumstances
- Request restriction of processing
- Object to processing based on legitimate interests
- Not be subject to solely automated decision-making

Requests relating to CCTV footage will be handled in line with data protection law and safeguarding considerations.

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## 12. How to Exercise Your Rights

If you wish to request access to CCTV footage or have questions about this Privacy Notice, please contact:

**CEO**

Christine Cameron

Aspirations Care Ltd  
Corinium House Barnwood Business Park  
Corinium Avenue  
Gloucester GL4 3HX

Aspirations (SL) Ltd  
Kings Buildings  
Hill St  
Lydney  
GL15 5HE

Email: [DPO@aspirationscare.com](mailto:DPO@aspirationscare.com)

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## 13. Complaints and the Information Commissioner's Office (ICO)

If you are unhappy with how we use CCTV or handle personal data, you have the right to complain to the Information Commissioner's Office (ICO):

Information Commissioner's Office

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Telephone: 0303 123 1113

Website: <https://ico.org.uk>

ICO Registration Number Aspirations Care Ltd: **Z8717214**

ICO Registration Number Aspirations (SL) Ltd: **ZB736413**