

Aerial Arts Studio – CCTV Policy

Last updated: April 2026

1. Purpose of CCTV

Aerial Arts Studio operates a Closed-Circuit Television (CCTV) system to help ensure the **safety and security of staff, members, visitors, and property.**

CCTV is used to:

- Promote a safe studio environment
- Protect against theft, damage, or criminal activity
- Support safeguarding concerns
- Assist with the investigation of accidents or incidents where required

CCTV is **not used** for routine monitoring of staff or members.

2. CCTV System Details

- CCTV equipment is provided by **Swann Security**
- System model: **Swann SWDVK-446852MQB-EU**
- Footage is recorded locally via a digital video recorder (DVR)
- Selected footage or event clips may be backed up using **Swann's secure cloud-based storage**
- Cameras operate **24 hours a day, 7 days a week**

3. Locations Covered

CCTV cameras are located **inside the studio only** and are positioned at **two corners of the studio space**, angled to provide coverage of **all fixed aerial equipment and communal training areas.**

- Cameras are installed to monitor general studio activity and equipment use for safety and security purposes
- **No CCTV cameras owned or operated by Aerial Arts Studio are installed on the exterior of the building**
- **No CCTV cameras are installed in toilets or other private areas**, including changing facilities

Camera placement has been carefully considered to minimise intrusion and is proportionate to the purpose of maintaining a safe environment for staff, members, and visitors.

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Clear signage is displayed throughout the premises to inform individuals that CCTV recording is in operation.

4. Lawful Basis for Processing

CCTV footage is collected and processed in accordance with the **UK General Data Protection Regulation (UK GDPR)** and the **Data Protection Act 2018**.

The lawful basis for processing CCTV footage is **legitimate interests**, specifically to maintain safety, security, and safeguarding within the studio environment.

5. Access to CCTV Footage

Access to CCTV recordings is strictly limited to:

- The studio owner
- Authorised personnel where there is a legitimate reason

Footage may be accessed only for purposes such as:

- Investigating incidents or accidents
- Addressing safeguarding concerns
- Supporting insurance or legal matters

Footage will not be shared with third parties unless required by law, requested by law enforcement, or necessary to protect individuals or property.

6. Storage & Retention

CCTV footage is stored securely using **local recording and cloud-based backup via the Swann system**.

- Footage is retained for **up to 30 days**, after which it is **automatically overwritten**
- Where footage is required for an **ongoing investigation, safeguarding concern, insurance claim, or legal obligation**, relevant footage may be retained for longer
- Retained footage will be deleted securely once it is no longer necessary

This retention period has been set in line with data protection principles and studio risk levels.

7. Individual Rights

Individuals recorded by CCTV at Aerial Arts Studio have the right to:

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- **Request access** to CCTV footage in which they appear (Subject Access Request)
- **Request deletion** of footage where legally applicable
- **Object to the processing** of CCTV footage in certain circumstances
- **Raise concerns** about how CCTV data is collected, stored, or used

Right to Object

Under data protection law, individuals have the right to object to the processing of their personal data where it is based on legitimate interests.

Aerial Arts Studio will consider any objection to CCTV use on a case-by-case basis. However, CCTV is operated for **essential safety, security, and safeguarding purposes**, and these interests will normally override an objection.

As CCTV forms part of the studio's health, safety, and safeguarding measures:

- Individuals **must be willing to be recorded by CCTV** in order to participate in classes, sessions, or activities within the studio.
- Where an individual does not consent to CCTV recording and objects to its use, **Aerial Arts Studio will not be able to offer participation in classes or activities.**

In such circumstances, the studio is happy to discuss **membership cancellation** in line with the applicable membership terms.

Subject Access Requests (SARs)

Requests for access to CCTV footage must be submitted in writing to:

 info@aerialartsstudio.co.uk

Where possible, requests should include:

- The **date and approximate time**
- The **location** within the studio

Proof of identity may be required before any footage is disclosed. Requests will be responded to within **one calendar month**, in line with data protection law

Access may be restricted or refused where:

- Footage would identify other individuals who cannot be reasonably anonymised

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- Disclosure would prejudice safeguarding, security, or legal matters
- The footage is no longer available

Deletion Requests

Requests for deletion of CCTV footage will be assessed on a case-by-case basis.

Footage will not be deleted where it is:

- Required for its original security or safeguarding purpose
- Needed for incident review, insurance, or legal obligations
- Still within the studio's stated retention period

Where no lawful reason for retention exists, footage will be deleted securely.

Availability of Footage

Aerial Arts Studio uses a **Swann CCTV system with rolling local recording and cloud-based backup**. As a result:

- CCTV footage is **automatically overwritten** once the retention period is reached
- Footage may **no longer be available** at the time a request is made
- The studio cannot guarantee the availability of footage outside of the stated retention period

Where footage is no longer held, this will be clearly communicated in response to any request.

8. Data Security

CCTV footage is stored securely and protected against unauthorised access or misuse. Appropriate technical and organisational measures are in place to safeguard all recorded data.

9. Responsibilities

Aerial Arts Studio is responsible for:

- Ensuring CCTV use remains proportionate and compliant with data protection law

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- Maintaining transparency and clear signage
- Reviewing CCTV use and this policy periodically

10. Policy Review

This CCTV Policy will be reviewed regularly and updated where necessary to reflect:

- Changes in legislation
- Updates to CCTV technology
- Changes to studio operations

Aerial Arts Studio

**Address: Unit A1 Forstal Business Park, Maidstone Road,
Paddock Wood, Tonbridge, Kent TN12 6PY**