



POLICY DOCUMENT

CCTV & Video Surveillance Policy

1. Introduction

Albatross Bus & Coaches Ltd operates CCTV systems within its vehicles (buses and coaches) to support safety, security and operational management. This policy outlines how CCTV is used, managed and controlled to ensure compliance with applicable legislation, including the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018 and relevant CCTV Codes of Practice.

The organisation is committed to ensuring that CCTV usage is proportionate, transparent and respectful of individuals privacy.

2. CCTV Overview

The CCTV system installed within Albatross Bus & Coaches vehicles is owned and operated by the company, which acts as the data controller for all recorded footage.

The Admin Officer is responsible for the overall management and operation of the CCTV system. This includes installation, maintenance, monitoring, recording, review of footage and ensuring compliance with this policy and legal requirements.

CCTV cameras are installed within buses and coaches to monitor passenger areas and entry/exit points. Cameras are positioned to ensure effective coverage for safety purposes while avoiding unnecessary intrusion into private areas.

Clear and visible signage is displayed vehicles to inform passengers, drivers and other individuals that CCTV recording is in operation.

The CCTV system operates continuously during vehicle operation and may record at all times when the vehicle is in use. Any new installation or significant change to CCTV usage will be subject to a Data Protection Impact Assessment (DPIA) to ensure lawful and proportionate use.

3. Purpose of the CCTV / Surveillance system

The use of CCTV within vehicles is necessary for legitimate business and safety purposes. The system is operated to support the following objectives:

- Prevention, deterrence and detection of crime and anti-social behaviour
- Protection of passengers, drivers and staff
- Investigation of incidents, complaints or disputes
- Support for insurance claims and legal proceedings

- Compliance with regulatory and safety requirements

Albatross Bus & Coaches Ltd will ensure that CCTV is used fairly, lawfully and only for the purposes stated above.

4. Monitoring and Recording

CCTV footage is recorded using secure systems installed within vehicles and/or central storage systems where applicable. Access to live or recorded footage is restricted to authorised personnel only.

Recorded images are of sufficient quality to support identification where necessary and are stored securely to prevent unauthorised access, alteration or disclosure.

Footage is not routinely monitored in real time but may be reviewed where necessary for safety, operational, or investigative purposes.

Key controls include:

- Restricted access to authorised personnel only
- Secure storage of recorded footage
- Controlled retrieval and review processes

5. Disclosure of images

CCTV images may be disclosed where there is a lawful basis to do so. Individuals may request access to their personal data captured via CCTV by submitting a Subject Access Request (SAR) along with appropriate proof of identity.

Where requests are made, sufficient details such as date, time, and location may be required to locate the relevant footage. All requests will be handled in accordance with the organisation's Subject Access Request procedures.

Before disclosure, consideration will be given to the privacy rights of other individuals captured in the footage. Where necessary, images may be redacted or consent sought before release.

CCTV footage may also be shared with:

- Law enforcement authorities
- Regulatory bodies
- Insurers
- Legal representatives

All disclosures must be authorised by the Data Protection Lead / Admin Officer and a record of disclosure will be maintained, including details of the request, authorisation, and reason for release.

6. Retention

CCTV footage will be retained for a maximum period of 30 days, after which it will be automatically overwritten, unless it is required for investigation, legal proceedings or evidential purposes.

Where footage is retained beyond this period, it must be justified, documented and authorised by a Director. Retained footage will remain subject to strict access controls and secure storage requirements.

7. Document owner and approval

The **Admin Officer** is the owner of this document and is responsible for ensuring that it is reviewed annually and updated where necessary to reflect changes in legal, regulatory or operational requirements.

Approved by

Managing Director: _____

Signature: _____

Approval Date: 15 April 2026

