CCTV done properly: the checklist

Signage, retention periods, cameras where staff work. The UK, Italy and Spain side by side.

Before you install

- [ ] You have asked the client what the system is for and written it down.
- [ ] The cameras cover only the area that purpose needs.
- [ ] If staff work in the area, the step required in that country has been taken (see table).
- [ ] The retention period has been decided and written down, with the reason.

On site

- [ ] There is a readable sign before the recorded area saying who operates the system and why.
- [ ] Automatic deletion is set to the agreed period. Factory defaults are not a decision.
- [ ] Access to footage is limited to the people the client has named.

At commissioning and handover

- [ ] You have checked that the recorder really deletes at the end of the period.
- [ ] You have given the client a document recording purpose, periods and access.
- [ ] The client knows how to extract footage when it is needed.

The rules in the three countries

	United Kingdom	Italy	Spain
Retention period	No minimum and no maximum: the purpose of the system decides, and you must be able to justify it.	No fixed number: the controller decides. The longer footage is kept, especially beyond 72 hours, the stronger the justification. Municipalities: 7 days for urban security. Blocks of flats: up to 7 days is considered reasonable.	One month at most from recording.
Signage	Clearly visible, readable signs telling people they may be recorded.	Before the recorded area, naming the controller and the purpose, with a pointer to the full notice.	Must state at least that processing takes place, who the controller is and that rights can be exercised.
Where staff work	Tell staff that they are being recorded and why.	A union agreement or, failing that, labour inspectorate authorisation, before installing.	Inform workers and, where they exist, their representatives beforehand. No cameras in changing rooms, toilets or rest areas.
Handing over footage	Someone asking for footage of themselves must usually receive it within one calendar month.	Retention can be extended at the request of the judicial authorities or police.	Footage that proves an incident must be made available to the authorities within 72 hours of learning it exists.

Sources: ICO video surveillance guidance; GOV.UK; Italian data protection authority (video surveillance FAQ); EDPB Guidelines 3/2019; Spanish Ley Orgánica 3/2018, articles 22 and 89.

An information tool, not legal advice. Rules change: always check the official source. The full articles are at sentinary.com.