

Appropriate Policy Document — Conditional Draft

USCN-APD-T01 • Version 0.1 working template • Prepared 19 October 2026

Document status	WORKING TEMPLATE — not formally approved or executed
Controller	UK Safety Camera Network Ltd (USCN)
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Source policies	USCN-POL-001 to 006; USCN-LIA-001 (approved 19 October 2026)
Important	No operationally commissioned cameras confirmed. No supplier processor status or international transfers verified.

Use only after legal-basis verification

This document is NOT an assertion that USCN has selected a particular DPA 2018 Schedule 1 condition. Confirm whether CCTV incident footage constitutes criminal-offence data and which condition supports each processing purpose.

Proposed condition []; legal analysis []; whether APD mandatory []; DPO approval [].

Compliance measures

Lawfulness: record Article 6 basis and applicable Article 10/Schedule 1 condition; assess necessity and proportionality in camera DPIA.

Fairness and transparency: layered notices, signs and rights contact; minimise field of view and use masking.

Purpose limitation and minimisation: restrict processing to authorised safety purposes; no routine audio, ANPR, facial recognition or behavioural profiling.

Accuracy and integrity: record context of incident allegations; avoid treating mere capture as proof of wrongdoing.

Security: encrypted local recording, restricted logged access, case-specific disclosure decisions, host no admin rights.

Accountability: ROPA, DPIAs, DPO authorisations, disclosure logs, review and audit.

Retention and review

Routine CCTV overwrite within maximum 31 days; lawful DPO-approved holds documented and reviewed; delete when no longer necessary.

Maintain APD for statutory period after processing ceases where applicable; review after legal or processing change.

Status: CONDITIONAL DRAFT; not adopted until Schedule 1 condition and applicability are verified and formally approved.