

Centrestage Productions

**YOUTH
THEATRE**

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CCTV Policy

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Approved by: Trustees

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Revision History

VERSION	DATE CREATED	DATE RATIFIED	AUTHOR	SUMMARY OF CHANGES
1.0	06/11/24	14/11/24	Mike Mullen	New Document

1. Policy Statement

- 1.1 The Charity uses Close Circuit Television ("CCTV") on the premises.
- 1.2 This policy applies to all members of our organisation, visitors to the premises and its surrounding area and all other persons whose images may be captured by the CCTV system.
- 1.3 The policy takes account of all applicable legislation and guidance, including:
 - 1.3.1 General Data Protection Regulation ("GDPR")
 - 1.3.2 Data Protection Act 2018 (together with the Data Protection Legislation).
 - 1.3.3 CCTV Code of Practice produced by the Information Commissioner.
 - 1.3.4 Human Rights Act 1998
- 1.4 This policy sets out the position of the organisation in relation to its use of CCTV.

2. Purpose of CCTV

- 2.1 The Trustees will use CCTV for the following purposes:
 - 2.1.1 To provide a safe and secure environment for staff and visitors.
 - 2.1.2 To prevent the loss of or damage to the Charities buildings and/or assets.
 - 2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.

3. Description of system

- 3.1 Some of the areas will have a number of cameras in and outside of the building. Some cameras have sound recording capabilities and there is a range of movable and fixed cameras. The camera are linked to an 8 channel system consisting of 6 cameras which is located in the **OFFICE**.

4. Siting of Cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purposes for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to members and visitors.
- 4.2 Camera will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The Charity will make all reasonable efforts to ensure that areas outside of the premises and grounds are not recorded.
- 4.3 Signs will be erected to inform individuals that there are in an area within which CCTV is in operation.

- 4.4 Cameras will not be sited in any areas where trustees and/or staff have an expectation of privacy, such as changing rooms or toilets.
- 4.5 Cameras may be located in communal areas and, where this is the case, visitors, volunteers and staff will be made aware. Access to the footage is restricted and will only be used to fulfil the purposes in 2.1

5. Privacy Impact Assessment

- 5.1 Prior to the installation or repositioning of any CCTV camera, or system, a privacy impact assessment will be conducted by the Charity to ensure that the proposed installation is compliant with legislation and ICO guidance. The assessment will be approved by the Charities designated Data Protection Officer.
- 5.2 The Charity will adopt a privacy by design approach when installing new cameras and systems taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

6. Management and Access

- 6.1 The CCTV system within the Charity will be managed by a member of the Management Committee.
- 6.2 Any allegations against charity staff and/or volunteers will be referred immediately to the Chairman and only they will determine who needs to view the footage and the course of action necessary.
- 6.3 On a day to day basis, the CCTV system will be operated by individual's who have been specifically trained in the operation of the system and are both competent and considered to have the appropriate technical ability.
- 6.4 The viewing of live CCTV images will be restricted to specific members of the Management Committee. In doing so, they will ensure that the purposes in 2.1 are satisfied.
- 6.5 Recorded images which are stored by the CCTV system will be restricted as in 6.4. Relevant images may be shared with relevant personnel allowing them to review incidents where disciplinary matters or complaints need to be addressed.
- 6.6 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 6.7 The CCTV system is checked daily to ensure it is operating effectively.

7. Storage and Retention of Images.

- 7.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purposes for which they were originally recorded.
- 7.2 Recorded images are stored a maximum of 30 days unless there is a specific purpose for which they are retained for a longer period.

- 7.3 The Charity will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
 - 7.3.1 CCTV recording systems being located in restricted access areas;
 - 7.3.2 The CCTV system being encrypted/password protected.
 - 7.3.3 Restriction of the ability to make copies to specified members of staff / volunteers.
- 7.4 A log of any access to the CCTV images including time and dates of access and a record of the individual accessing the images will be maintained by the Charity.

8. Disclosure of Images to Data Subjects.

- 8.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 8.2 Any individual who requests access to images of themselves will be considered to have a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the Charities Subject Access Requests Policy.
- 8.3 When such a request is made, the appropriate individual with access to the CCTV footage (ref 6.4) will review the CCTV footage, in respect of relevant time periods where appropriate in accordance with the request.
- 8.4 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The individual accessing the footage must take appropriate measures to ensure that the footage is restricted in this way.
- 8.5 If the footage contains images of other individuals then the Charity must consider whether:
 - 8.5.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals.
 - 8.5.2 The other individuals in the footage have consented to the disclosure of the images, or their consent to be obtained, or
 - 8.5.3 If not, whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 8.6 A record must be kept, and held securely, of all disclosures which sets out:
 - 8.6.1 When the request was made;
 - 8.6.2 The process followed by individual with access to the CCTV footage in determining whether the images contained third parties.
 - 8.6.3 The considerations as to whether to allow access to those images;

8.6.4 When the individuals that were permitted viewed the images.

8.6.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

Note that, when a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. There is reference here only to "access" as opposed to a "permanent copy" as the Charity may consider it preferable in certain circumstances to seek to allow access to images by viewing in the first instance without providing copies of images. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However, if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.

9. Disclosure of Images to Third Parties

9.1 The charity will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.

9.2 CCTV images will only be disclosed to law enforcement agencies in line with the purpose for which the CCTV system is in place.

9.3 If a request is received from a law enforcement agency for disclosure of CCTV images then the individual with access to the CCTV footage must follow the same process as above in relation to subject access requests. Details should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.

9.4 The information above must be recorded in relation to any disclosure.

9.5 If an order is granted by a court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the court order requires. If there are any concern as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

10. Review of Policy and CCTV System

10.1 This policy will be reviewed annually or earlier should the need arise.

11. Misuse of CCTV Systems

11.1 The misuse of CCTV system could constitute a criminal offence.

11.2 Any trustee / member of staff / volunteer who breaches this policy may be subject to disciplinary action.

12. Complaints relating to this policy.

- 12.1 Any complaints relating to this policy or to the CCTV system operated by the Charity should be made in accordance with the Charities Complaints Policy.

Signed



Mike Mullen

On behalf of the trustees