

GUIDE BRIDGE THEATRE

CCTV POLICY

Policy summary

Guide Bridge Theatre Ltd (GBT) has in place a Closed-Circuit Television (CCTV) surveillance system. This policy details the purpose, use and management of the CCTV system and details the procedures to be followed in order to ensure that GBT complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures therein detailed, applies to all of the GBT CCTV systems capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.



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Introduction

1. GBT uses closed circuit television (CCTV) images for the purposes of safety, crime prevention, detection and prosecution of offenders and to monitor the GBT premises in order to provide a safe and secure environment for members, volunteers, patrons and visitors, and to prevent the loss of or damage to GBT contents and property and to monitor the licensing principles for the purpose of the premises licence.
2. The CCTV system is owned and managed by GBT. GBT is the system operator, and data controller, for the images produced by the CCTV system, and is registered with the Information Commissioner's Office, Registration number ZB094945.
3. The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

Purpose

4. This Policy governs the installation and operation of all CCTV cameras at GBT.
5. CCTV surveillance is used to monitor and collect visual images for the purposes of:
 - protecting the premises and assets, both during and outside of opening hours, promoting the health and safety of members, volunteers, patrons and visitors,
 - reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
 - supporting the Police in a bid to deter and detect crime;
 - assisting in identifying, apprehending and prosecuting offenders;
 - compliance with the premises licence, and
 - ensuring that the rules are respected so that the site/s can be properly managed.

Scope

6. This policy applies to GBT and the premises controlled by the CCTV system.
7. This policy is applicable to, and must be followed by, users of the GBT premises. Failure to comply could result in the implied licence to enter the premises granted to such persons being revoked.
8. All GBT volunteers (systems users) involved in the operation of the CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
9. All systems users with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will have relevant skills and training on the operational, technical and privacy considerations and fully understand the policies and procedures.

Definitions

CCTV – closed circuit television camera. A TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes and where access to their content is limited by design only to those able to see it.



Data controller - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of CCTV images.

Data Protection Act 2018 (DPA) - UK data protection framework, regulating the processing of information relating to individuals.

Facial/ automated recognition - the use of camera technology to identify individuals' faces and to make automated matches.

UK General Data Protection Regulations (UK GDPR) - UK data protection framework, regulating the processing of information relating to individuals.

Surveillance Camera Code of Practice 2013 (Amended November 2021) - statutory guidance on the appropriate and effective use of surveillance camera systems issued by the Government in accordance with Section 30 (1) (a) of the Protection of Freedoms Act 2012.

System Operator - person or persons that take a decision to deploy a surveillance system, and/or are responsible for defining its purpose, and/or are responsible for the control of the use or the processing of images or other information obtained by virtue of such system.

System User - person or persons who may be employed or contracted by the system operator who have access to live or recorded images or other information obtained by virtue of such a system.

Policy

Policy statement

10. GBT will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
11. GBT complies with any Codes of Practice issued by the Information Commissioner's Office (ICO) to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
12. The CCTV system will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
13. The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.
14. Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:
 - cover the specific area to be monitored only;
 - keep privacy intrusion to a minimum;
 - ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage);
 - minimise risk of damage or theft.

15. CCTV will **not** be used for the purposes of streaming live events held in the GBT Premises.
16. Interior CCTV will not record areas set aside for private areas where one would not expect to be filmed, for example changing rooms. while praying.

Location and signage

17. Cameras are sited to ensure that they cover the GBT premises as far as possible. Cameras are installed throughout the site including the front and rear entrances, access road, car park, box office and licensed bar area.
18. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the GBT premises, which may include outdoor areas.
19. Signs are placed at all pedestrian and vehicular entrances in order to inform all visitors who may use the GBT premises that CCTV is in operation.
20. The signage indicates that monitoring and recording is taking place, for what purposes, the hours of operation, who the system owner is and where complaints/questions about the systems should be directed.
21. Signage templates are included in Appendix 1.

Monitoring and recording

22. Live footage is displayed on a monitor behind the bar. The monitoring and recording equipment is in the cellar to which access is limited as the bar is locked with limited key holders. Access is limited to GBT Directors and any such persons as authorised by them from time to time. The security installer can be granted discrete access to problem solve at the direction of the GBT Directors. Such persons are able to respond to incidents identified on CCTV monitors.
23. Where CCTV is added for security purposes, a fixed and secure lockbox/cabinet is used for monitoring and viewing CCTV images, and the data can be accessed via a wireless device.
24. Images are recorded on secure servers and are viewable by the above mentioned. Additional staff may be authorised by the GBT Directors to monitor cameras sited within their own areas of responsibility on a view only basis.
25. Where Cloud-based storage is used they will ensure that such storage is located in the European Economic Area (EEA), and that all relevant security and data protection measures are in place.
26. Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g. time, date and location) is recorded reliably, and compression of data does not reduce its quality.
27. Viewing monitors are switched off when not in use to prevent unauthorised use or viewing.

28. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked periodically to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
29. All images recorded by the CCTV System remain the property and copyright of GBT.

Covert surveillance

30. Covert surveillance is the use of hidden camera's or equipment to observe and/or record the activities of a subject which is carried out without their knowledge.
31. GBT will not engage in covert surveillance.

Data Protection

32. In its administration of its CCTV system, GBT complies with the UK General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and in accordance with its Data Protection Policy.

Data Protection Impact Assessments

33. The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This may include consultation with relevant internal and external stakeholders.

Applications for disclosure of images

34. Requests by individual data subjects for images relating to themselves via a Subject Access Request or a request for images made by a third party should be submitted to GBT together with proof of identification and/or purpose. Further details of this process are detailed in the GBT Data Privacy Notice available on the website.
35. In order to locate the images on the system sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
36. Where GBT is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.
37. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
38. Such disclosures will be made at the discretion of GBT, with reference to relevant legislation and where necessary, following advice.
39. Where a suspicion of misconduct arises GBT may access the CCTV images for use in enforcement actions.

40. A log of any disclosure made under this policy will be held by GBT itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
41. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
42. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
43. Images may be released to the media for purposes of identification. Any such decision to disclose will be taken in conjunction with the Police and/or other relevant law enforcement agencies.
44. Surveillance recordings **must not be** further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of images

45. Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 31 calendar days from the date of recording. Images will be automatically overwritten or destroyed after this time.
46. Where an image is required to be held in excess of the retention period GBT will be responsible for authorising such a request, and recordings will be protected against loss or held separately from the surveillance system and will be retained for 6 months following date of last action and then disposed of as above
47. Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidentiary purposes will be deleted.
48. Access to retained CCTV images is restricted to such persons authorised from time to time by GBT.

Complaints Procedure

49. Complaints concerning the GBT's use of its CCTV system or the disclosure of CCTV images should be made to The Directors, GBT Ltd at the address below.

Review Procedure

50. There will be an annual review of the use of the CCTV system to ensure it remains necessary, proportionate and effective in meeting the stated purposes.
51. As part of the review of GBT will assess:
 - whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation;
 - the monitoring operation, e.g. if 24 monitoring in all camera locations is necessary or whether there is a case for reducing monitoring hours;
 - whether there are alternative and less intrusive methods to achieve the stated purposes.



Responsibilities

52. GBT is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.

53. GBT is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

54. GBT Directors will control the authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.

Approval and review

Approved by GBT Board	2023 05 05
Policy owner	GBT Ltd
Policy author	GBT Directors
Date	
Review date	2024 05 04

Revision history

Version no.	Revision date	Previous revision date	Summary of changes
8.1	February 2013		
8.2	2023 04 22	February 2013	Legislation update Updated system LIA and DPIA completed