



12.0 CCTV Policy

Introduction

Helpston Playhouse uses closed circuit television (CCTV) images to reduce crime and monitor the Playhouse and school buildings in order to provide a safe and secure environment for pupils, staff and visitors, and to prevent the loss or damage to Playhouse and school property.

- The system comprises of a number of fixed cameras.
- The system does not have sound recording capability.
- The CCTV system is owned and operated by the Playhouse and the deployment of which is determined by the Playhouse Manager and Committee.
- The CCTV is monitored centrally from the Playhouse office by the Manager or designated staff member.
- The Playhouse's CCTV system is registered with the Information Commissioner under the terms of GDPR and the Data Protection Act 2018. The use of CCTV, and the associated images, is covered by GDPR. This policy outlines the Playhouse's use of CCTV and how it complies with the Act.
- All authorised operators and employees with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained by the Playhouse Manager in their responsibilities under the CCTV code of Practice. All employees are aware of the restrictions in relation to access to, and disclosure of, recorded images.

Statement of Intent

- The Playhouse complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in

its continued use. The Code of Practice is published at:

<https://ico.org.uk/media/1542/cctv-code-of-practice.pdf>

- CCTV warning signs will be clearly and prominently placed. In areas where CCTV is used, the Playhouse will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.
- The planning and design has endeavoured to ensure that the scheme will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Positioning of the Cameras

- Cameras will be sited so they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The Playhouse will ensure that the location of equipment is carefully considered to ensure the images captured comply with GDPR and the Data Protection Act 2018.
- The Playhouse will make every effort to position cameras so that their coverage is restricted to the Playhouse and John Clare School premises, this includes some outdoor areas.
- CCTV will not be used inside the Playhouse or inside John Clare School classrooms.
- Members of staff should have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

Storage & Retention of Images

- We do not record any data unless it is required by the Police. Any data will be recorded onto a memory stick and passed over to the police.
- Data is destroyed automatically by the system after a set period of time.
- While retained, the integrity of the recordings will be maintained to ensure evidential value and to protect the rights of the people whose images have been recorded.
- Any retained data will be stored securely by the Police.

Access to CCTV images

- Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available.
- The Manager and Committee give staff authorisation to access the recorded images; Manager, Deputy Manager, Chair, Out of school Supervisor. In the event of a serious

incident requiring immediate access and in the absence of the authorised staff permission to access images must first be sought from the Manager or Chair of the Committee.

- When accessing images two authorised members of staff must be present. A written record of access will be made. Records of access will be kept.

Subject Access Requests (SAR)

- Individuals have the right to request access to footage relating to themselves under GDPR.
- All requests should be made in writing to the Manager. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- The Playhouse will respond to requests within 40 calendar days of receiving the written request and fee.
- A fee of £10 will be charged per request.
- The Playhouse reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.
- A record of the date of disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

Access to and Disclosure of images to Third Parties

- There will be no disclosure of record data to third parties other than to authorised personnel such as the police and service providers to the Playhouse where these would reasonably need access to the data e.g. Investigators. John Clare School is authorised to have access to the data.
- Requests should be made in writing to the Manager.
- The data may be used within the Playhouse's discipline and grievance procedure as required and will be subject to the usual confidentiality requirements of those procedures.
- The Playhouse will consider whether a request is genuine and whether there is any risk to the safety or the privacy intrusion to third party individuals. Consideration will be given to the nature and context of the footage requested.
- A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they

represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

- Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.

Breaches of the Code (including breaches of security) (NEW)

- Any breach of the Code of Practice by Playhouse staff will be investigated by the Manager and Finance Administrator for them to take the appropriate disciplinary action.

Complaints

- Complaints and enquiries about the operation of CCTV within the Playhouse should be directed to the Manager in the first instance.

Staff Training

- Staff authorised to access the CCTV system will be trained to comply with this policy.
- Staff will understand that all information relating to the CCTV images must be handled securely.
- Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.
- Staff misuse of surveillance system information will lead to disciplinary proceedings.

This policy was adopted by	Helpston Playhouse
On	14 th June 2019
Date to be reviewed	14 th June 2020
Signed on behalf of the provider	
Name of signatory	Amy Ellis
Role of signatory (e.g. chair, director or owner)	Chair

Appendices

- Appendix A - Checklist