



Policy for CCTV

Policy Review Schedule

Date Policy was last Reviewed:	Creation
Date of previous Policy Review:	None
Suggested Date for Review:	July 2023

1.0 Overview

1.1 The Lowestoft Players Ltd. uses closed circuit television (CCTV) images to provide a safe and secure environment for the membership, visitors to the building and to protect property belonging to The Lowestoft Players.

1.2 This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 2018 (GDPR) in respect of data privacy and security.

2.0 Purposes of CCTV

2.1 The purpose of the installed CCTV system is to:

- Assist in the prevention or detection of crime or equivalent malpractice.
- Assist in the identification and prosecution of offenders.
- Monitor unauthorised entry to the premises.
- Monitor the security of the premises and the contents within.
- Assist with the identification of unauthorised actions or unsafe working practices.

3.0 Location of cameras

3.1 Cameras are located at strategic points in the premises. Cameras must be positioned so that they only cover communal or public areas on the Company's business premises and they have been sited so that they provide clear images.

3.2 No camera focuses, or will focus, on toilets or designated changing areas.

3.3 All cameras are clearly visible.

3.4 Appropriate signs are prominently and clearly displayed so that everyone is aware they are entering an area covered by CCTV.

4.0 Recording and retention of images

4.1 Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended.

4.2 Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

4.3 Images will be recorded in constant real-time (24 hours a day throughout the year).

4.4 As the recording system records digital images, any CCTV images that are held on the SD Card, hard drive of a PC or a server are deleted and overwritten on a recycling basis and, in any event, are not held for more than three months.

4.5 Images may be backed up using cloud storage so that the recordings are not held on site. The storage should be secure and any images should be overwritten on a recycling basis and, in any event, are not held for more than three months.

4.6 Once a hard drive has reached the end of its use, it will be erased prior to disposal.

4.7 Images that are stored on, or transferred on to, removable media such as USB Devices or CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of one month. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

5.0 Access to and disclosure of images

5.1 Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained.

5.2 Images can only be disclosed in accordance with the purposes for which they were originally collected.

5.3 The images that are filmed are recorded and held in a secure location.

5.4 Access to recorded images is restricted to the operators of the CCTV system and in accordance with the purposes of the system.

5.5 Viewing of recorded images will take place in a private area to which others will not have access when viewing is occurring.

5.6 Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- The committee of The Lowestoft Players, to assist in a disciplinary process.
- Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

5.7 The CCTV operator in agreement with the committee are the only persons who are permitted to authorise disclosure of information to external third parties such as law enforcement agencies.

5.8 All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

6.0 Individuals' access rights

6.1 Under the Data Protection Act 2018, individuals have the right on request to receive a copy of the personal data that The Lowestoft Players holds about them, including CCTV images if they are recognisable from the image.

6.2 To request access any CCTV images, you must make a written request to the Secretary to the Directors of the Lowestoft Players. All requests must include the date and time when the images were recorded and the location of the particular CCTV camera, so that the images can be located and your identity can be established as the person in the images. * Note. The Lowestoft Players will always check the identity of the person making the request before processing it.

6.3 The CCTV Operator will first determine whether disclosure of your images will reveal third party information (as you have no right to access CCTV images relating to other people). In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

6.4 If the organisation is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

6.5 The organisation will only undertake covert recording with the written authorisation of the committee or chairperson where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring may include both video and audio recording.

6.6 Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.

6.7 Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Company cannot reasonably be expected to ignore.

7.0 Review

7.1 The committee of The Lowestoft Players are responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct an annual review of the organisations use of CCTV. Any complaints or enquiries about the operation of the organisations CCTV system should be addressed to them.