

NEW
THEATRE
ROYAL
PORTSMOUTH

CCTV Policy

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1. Introduction

NTR has 3 CCTV cameras in the front of house area and acts as the data controller for the video footage that is recorded on these cameras. This CCTV policy forms part of our Privacy Policy.

2. CCTV System Overview

NTR's CCTV system is in operation at New Theatre Royal only.

There are 3 cameras located in the theatre foyer and stalls ingress and egress corridors.

Footage recorded by this system is stored on a DVR (Digital Video Recorder) that is located within the Theatre Box Office. Individuals that are recorded by this system include staff, audiences, public visitors to the theatre site, visiting artists and visiting contractors.

3. Show relay system

NTR operates a show relay system which is used by staff to see what is happening on stage. One camera is in operation within our main auditorium.

Recording does not take place unless there is a specific reason to do so, such as making archive recordings of work to be reviewed by creative teams. Individuals that may be recorded by this system are artists on our stages and our staff.

4. Purposes & uses of the CCTV system

Our CCTV system is used for the following purposes:

To meet the requirements of our premises licence for the prevention of crime and disorder, public safety, the prevention of public nuisance and the protection of children from harm in our buildings.

- For the prevention of crime, by dissuading those who are considering undertaking criminal activity on our site.
- To investigate any criminal activity that may have taken place on our premises.
- To supply footage to law enforcement agencies if requested to do so.
- To supply footage to local authority (Portsmouth City Council) if requested to do so.
- To support operational management needs of the New Theatre Royal to identify and respond to any incidents on our premises when they take place.
- To manage visiting contractors and the work that they are undertaking, to ensure that all contractors are acting in a safe and appropriate manner at all times when the New Theatre Royal site.
- To enable the live relaying of activity on our stages to members of our team.

5. Monitoring

CCTV footage from NTR's video cameras are monitored through:

Static monitoring of live footage undertaken by our Duty Managers and Duty Technicians.

6. Data Quality

NTR will endeavour to ensure that the CCTV images used are clear and of a high quality.

7. Data Security

The nominated individual for NTR, designated as the Systems Manager will ensure that CCTV data is secure by doing the following:

- Ensure that the CCTV system is regularly checked to ensure that it is working correctly.
- Ensure that the CCTV system can only be accessed by authorised individuals.
- Ensure that the CCTV system and recordings can only be accessed by named post holders.
- Ensure that recordings from the CCTV are secure, either as a cloud-based system (with appropriate encryption), or when on a DVR hard drive system in the theatre (where it is locked and secure).
- Ensure that access to the CCTV system and recordings is protected, via usernames and passwords.
- Ensure that all staff are properly trained on the appropriate use of the CCTV system.
- Footage where individuals can be identified will not be shared with another individual or organisation, apart from requests from law enforcement agencies.

8. Who can access footage and how do they do this

- Only designated team members are allowed to access and view CCTV live footage and recordings.
- Designated team roles who are allowed to operate the CCTV system are as follows: Our Duty Managers and Duty Technicians.
- Designated team roles who are allowed to access recordings from the CCTV system are as follows: Our Director of Operations, Head of Marketing, Senior Technician and Box Office Manager.
- To access footage a username and password is required.
- Footage will not be viewed by any team member or individual whose role is not designated as having a right to access it.
- Footage will only be accessed for the reasons outlined in Section 4.

9. Compliance with data protection legislation & ensuring fair processing.

To ensure that NTR use, and operation of its CCTV system is complying with the General Data Protection Requirements 2016/679 (GDPR) the following measures will be undertaken:

- NTR is registered with the Information Commissioners Office as a Data Controller.
- We will inform all individuals who visit our building about our use of CCTV.
- Where areas are covered by a CCTV camera, prominent signage will be displayed to inform individuals of this.
- NTR's CCTV policy will be made available on our website, as part of its privacy policy.
- NTR's privacy policy will include a summary of what our CCTV cameras are used for, with a link to the full policy.
- Our staff members will be informed of NTRs CCTV policy, ensuring that they are aware

that they may be recorded whilst undertaking their role at our theatre and what those recordings will be used for.

- We have clear guideline for how individuals can access CCTV footage that features them.

10. Nominated individual who is responsible for the CCTV System

The nominated person who is responsible for the usage of the NTR's CCTV system is the postholder of Operations Director.

The Operations Director and the Systems Manager will be responsible for ensuring the following:

- That the CCTV system is used appropriately at all times.
- That the CCTV system is working correctly.
- That only designated members of NTR team have access to the CCTV system.
- That the CCTV system is only used for the purposes that are outlined in Section 4 of this document.
- That staff training is undertaken with all individuals who access the CCTV system, so that they are clear on what their responsibilities are and what is the permitted usage of the system.
- That all recordings held by the CCTV system are deleted within 10 days, unless they have been downloaded in line with section 4.
- That staff are properly trained in how to operate the CCTV system and cameras.
- That staff are trained on how to recognise and respond to requests for CCTV information and images.
- That the CCTV images used are clear and of a high quality.

11. Applications for disclosure of images

Requests are made to:

Operations Director

New Theatre Royal

20-24 Guildhall Walk

Portsmouth

PO1 2DD

info@newtheatreroyal.com

In your request, please outline what data you wish to view and in what format to wish to receive it.

Your request will then be reviewed by the Operations Director and the Head of Marketing and you will receive a reply within 30 days.

You also need to provide two official ID documents with your request so that we can confirm your identity. Our timescale of 30 days to respond to your request will begin once proof of ID is received.

12. How we will respond to your request

Once a request has been received and your identity proven, the theatre team will then make

all reasonable effort to access the footage from the required time and date.

Once the footage has been located, the theatre team will then consider the following, in line with guidance from the Information Commissioner's Office:

- Does the request require disclosing information that identifies another individual.
- Has/have the other individual(s) provided consent for their personal information to be shared.
- Is it reasonable to disclose without consent.

If the footage that you are requesting does not contain images of any other third parties; You will be supplied with the footage as an encrypted video file.

If the footage that you are requesting does contain images of third parties, where consent for sharing can be obtained: Once permission has been received by the third parties concerned, you will be supplied with the footage, as an encrypted video file.

If the footage that you are requesting contains images of third parties, where consent for sharing is not possible to obtain;

We have a responsibility to protect the data of individuals shown in CCTV footage, particularly of audiences visiting our theatre that include adults, young people, children and vulnerable groups.

If the footage required, features identifiable third parties (such as members of the public), then the footage will not be supplied as a video file to the individual making the request. This is to protect the data of the third-party individuals and to ensure that the video file is not inadvertently shared further or placed online in the public domain.

In these instances, the individual's request will be discussed with the Information Commissioners Office and advice will be sought on how to provide a fair and appropriate resolution to this.

13. Recording of requests made & their resolution.

The Operations Director will ensure that all requests for access to CCTV footage will be logged including:

- The date that the information was requested.
- Evidence received to prove the identity of the individual.
- Assessment of whether the footage contains data on third parties.
- Decision on how the footage will be supplied (as video files or access via an appointment for online viewing).
- When the footage was supplied to the individual.
- Any further questions or requests from the individual and their resolution.
- Any advice that has been received by the Information Commissioners Office.

14. Procedures for supplying CCTV footage.

Once agreement has been made to supply video footage, the following procedures will be followed:

- Footage will be identified and downloaded by those identified in section 8.
- Once located, the video footage will be downloaded as a video file.
- The video file will then be encrypted and uploaded to the theatre's secure Microsoft Teams system.

- The individual requesting the footage will be sent a password protected link to the footage, for them to download.

15. Retention of images

Recordings of footage from our CCTV cameras will be kept for maximum of 10 days after which time all recordings will be permanently deleted.

Footage maybe retained for longer than 10 days if it has been requested by the relevant authorities as evidence for part of a criminal investigation.

16. Monitoring compliance

NTR will ensure compliance with its CCTV policy by doing the following (for which the Operations Director is responsible):

- Keeping logs of who has requested to review CCTV footage.
- Keeping logs of the outcomes of requests to review CCTV footage, including the recording of how and when access was granted.
- Regular monthly checks to ensure that CCTV footage has been deleted after 10 days.
- Monthly checks undertaken to ensure that all public signage is in place, to inform visitors and staff of the existence of CCTV cameras.
- Monthly checks to ensure that the CCTV system is working and that recordings are of a high quality.