

# **CCTV** policy

This policy was approved by the Trustees on 21 January 2021 and will be reviewed no later than 2026.

# 1 Ownership

The British Museum operates a CCTV surveillance system ("the system") throughout the Museum estate, with images being monitored and recorded centrally. The system is owned and managed by the Museum and operated by the Museum Visitor and Security Services Department.

The responsible manager is the Head of Visitor and Security Services.

## 2 Compliance

Images obtained from the system which include recognisable individuals constitute personal data and are covered by the Data Protection Act 2018 (DPA)(as amended) and the United Kingdom General Data Protection Regulation (UK GDPR)(together "the Act"). This Policy should be read in conjunction with the British Museum's Privacy Policy.

The Trustees of the British Museum are the registered data controllers under the terms of the Act. The Data Protection Officer for the Museum is responsible for ensuring compliance with the Act.

This policy has been drawn up in accordance with the advisory guidance contained within the Information Commissioner's CCTV Code of Practice and the Surveillance Camera Commissioner's Code of Practice.

# 3 Purpose

The Museum's registered purpose for processing personal data through use of the system is crime prevention and/or staff monitoring. This is further defined as:

CCTV is used for maintaining public safety, the security of property and premises and for preventing and investigating crime, it may also be used to monitor staff when carrying out work duties. For these reasons the information processed may include visual images, personal appearance and behaviours. This information may be about staff, customers and clients, offenders and suspected offenders, members of the public and those inside, entering or in the immediate vicinity of the area under surveillance. Where necessary or required this information is shared with the data subjects themselves, employees and agents, services providers, police forces, court or tribunal, security organisations and persons making an enquiry.

The operators of the system recognise the effect of such systems on the individual and the right to privacy.

The Trustees of the British Museum are registered on the data protection register which is accessible on the Information Commissioner's Office <u>website</u>.

# 4 Description

The system is intended to produce images which are as clear as possible and appropriate for the purposes stated. It is operated to provide, when required, information and images of evidential value.

Cameras are located at strategic points throughout the Museum estate.

Signage is prominently placed throughout the estate to inform staff, visitors and members of the public that a CCTV installation is in use and includes contact details for further information.

# 5 Operation

Images captured by the system are recorded continuously and may be monitored in the Control Room. Images displayed on monitors are not visible from outside the Control Room and access to the Control Room is strictly limited. CCTV images and recordings are stored securely on an encrypted database.

All Security staff working in the Control Room are made aware of the sensitivity of handling CCTV images and recordings. The Senior Controller will ensure that authorised staff are fully briefed and trained in all aspects of the operational and administrative functions of the system.

Detailed procedures for the management of the system are included in the overall Control Room Standard Operating Procedures ("SOPs").

#### 6 Information retention

No images or information shall be stored for longer than is required for the stated purpose. Images will be securely deleted once their purpose has been discharged. [

#### 7 Access

All access to recorded images is recorded in the Control Room daily log. Access to images is restricted to those who need to have access in accordance with this policy, the SOPs and as required by any UK legislation then in force or by order of a UK court of law.

Disclosure of recorded material will only be made to third parties if this is necessary to fulfil the purposes set out at paragraph 3 and/or in compliance with the Act.

Anyone who believes that they have been filmed by the system can request a copy of the recording by making a Subject Access Request in accordance with the Act and subject to any restrictions therein. Data subjects also have the right to request that inaccurate data be corrected or erased and to seek redress for any damage caused. Procedures are in place to ensure that all such access requests are dealt with effectively and in accordance with UK law. Access requests should be addressed to compliance@britishmuseum.org.

Any breaches to the security of retained CCTV data will be reported immediately to the Head of Visitor and Security Services and the Data Protection Officer and, if a personal data breach has occurred, will be dealt with in accordance with the guidance issued by the Information Commissioner's Office.

### 8 Covert Recording

Covert cameras may be used only in very limited circumstances. This requires the written authorisation of the Head of Visitor and Security Services, the Deputy Director (Operations) and, where this may involve the covert recording of members of staff, the Director of Resources.

Covert surveillance may be carried out in cases of suspected specific criminal activity only where the objective of making the recording would be seriously prejudiced should the individual(s) concerned be informed of such surveillance.

Any authorisation to use covert surveillance must include a justification of the need to use such methods to obtain evidence of suspected criminal activity in a specific case; an assessment of alternative methods of obtaining such evidence and a statement of how long the covert monitoring should take place. The authorisation must be reviewed every 28 days to consider whether it should continue or be closed. Any decision to use covert surveillance for any reason must be fully documented and records of such decision retained securely.

#### 9 Feedback

Members of the public should address any concerns or complaints over use of the Museum's CCTV system to <a href="mailto:compliance@britishmuseum.org">compliance@britishmuseum.org</a> or by telephone to the Museum switchboard 020 7323 8000. Museum staff should address any enquiries or concerns relating to the system to their line manager in the first instance.

## 10 Annual Review

This policy will be reviewed annually by the Internal Controls Committee to ensure that the purpose still applies, and every five years by the Trustees.