



CCTV Code Of Practice

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1. **Introduction and Objectives**

1.1 **Introduction**

The Beatles Story Ltd owns and operates a Closed-Circuit Television ('CCTV') System throughout their premises, Albert Dock and Pier Head, with images being monitored and recorded at both sites.

1.2 This document, along with individual systems Codes of Practice, are designed to give clear guidelines on The Beatles Story's use of CCTV, to protect the organisation and their CCTV operators from allegations of misuse of the system and to protect staff and the public from any abuse of the CCTV system.

1.3 This policy covers the use of CCTV equipment and the gathering, storage, use and disposal of visual data. This policy applies to all staff employed by The Beatles Story and should be the standard expected from any external agencies or persons who operate CCTV systems on its behalf.

1.4 **Definitions**

Controller: **The Beatles Story LTD**

Owner: **The Beatles Story LTD**

**System Administration
Manager:**

Operations Manager, who will have day to day responsibility for the system.

System Ownership: **The Beatles Story LTD**

**Data Protection Policy
GDPR Policy** **Merseytravel**

**Commissions Office
Registration** **Merseytravel**

1.5 **Objectives of the System**

The objectives of the CCTV system are to reduce crime and the fear of crime by helping to provide a safer environment for those people who visit and work within The Beatles Story premises or assist staff to carry out their duties.

The system will provide the Police and partner agencies with assistance to detect deter and prevent crime. It will:

- help identify, apprehend, and prosecute offenders.

- provide the Police with evidence to enable criminal and civil proceedings to be brought to the courts.
- and help to maintain public order.

In addition, the system will enable crime detection, crime prevention, public and contractors to be effectively managed by The Beatles Story.

Images captured by the CCTV system may also be accessed during internal disciplinary investigations subject to the framework set out in Section 8 of this Code.

The system will be operated at all times with due regard for the privacy of individuals and will not be used to invade the privacy of any individual in residential, business or other private premises, buildings or land.

The system will not be used to harass any person or group of persons going about their business in a lawful way.

Any user found to have contravened the privacy of an individual in breach of this Code of Practice, will be subject to the disciplinary procedures of The Beatles Story LTD.

1.6. Legislation

In addition to the Beatles Story policies, procedures, guidelines, and Codes of Practice issued by the Information Commissioner and Surveillance Commissioner, CCTV and its operation are subject to legislation under:

- 1.6.1 The Data Protection Act 1998 (DPA 1998)
- 1.6.2 The (UK) General Data Protection Regulation (GDPR)
- 1.6.3 The Data Protection Act 2018 (DPA 2018)
- 1.6.4 The Human Rights Act 1998 (HRA)
- 1.6.5 The Freedom of Information Act 2000 (FOIA)
- 1.6.6 The Protection of Freedoms Act 2012

2. Code of Practice

2.1 The key objectives of the system are to:

- provide public reassurance and to deter crime.
- detect, prevent, or reduce the incidence of all crime.
- improve general security in the area, both in terms of personal safety and the security management of buildings and premises.
- reduce graffiti, vandalism, and other criminal damage.
- reduce the level of disorder and minor crime in and around the premises.

- improve communication between staff, contractors and Police patrols in the areas covered and assist in the policing of the area.
- assist the Police with specific operations aimed at either catching criminals or intelligence gathering and in the event of acts of terrorism or civil emergencies.
- monitor contractors to provide information on their location for their security and protection.
- monitor contractors' attendance and adherence to their conditions of contract.
- protect the Beatles Story from spurious claims of negligence.
- assist with the surveying of the premises to ensure the property is maintained in good order.
- allow The Beatles Story to claim the cost of damage to its premises by others.
- allow The Beatles Story to investigate incidents involving both staff and members of the public in and around its premises.

- 2.2 Any member of the General Public who approaches the Beatles Story requesting to view the content of any CCTV images regarding any incident will be advised to contact the Beatles Story via email (enquires@beatlesstory.com), the General Manager will ascertain the validity of the request. Where a member of the public specifically asks to see CCTV images of themselves, they should be advised of the subject access provisions under the DPA or the GDPR.
- 2.3 Any requests from the Emergency Services or Law Enforcement Agencies for CCTV images must be made on the agreed standard form (please see appendix 5) and submitted to The Beatles Story via email (enquires@beatlesstory.com). Upon collection of the USB the requestor will also sign a Data Release Form and accept responsibility as part of their obligations under the DPA 2018 or the GDPR for any image(s) released into their care.
- 2.4 All internal requests for access to CCTV images for business reasons, whether of live or recorded images, must be made via the CCTV request form on the online system. The individual collecting the images will also sign and accept responsibility for any data released into their care.
- 2.5 All images provided to external third parties (other than those detailed at 2.3) must be accompanied by a covering letter setting out the conditions under which the images are disclosed (i.e., for use in connection with legal proceedings, as a subject access request, etc.).
- 2.6 The procedure for internal requests for HR purposes, including employees' responsibilities when handling the images, is addressed at Clause 8.
- 2.7 All CCTV images provided by The Beatles Story shall remain the property of The Beatles Story at all times and at no time is the

copyright transferred to the recipient.

2.8 No CCTV shall intentionally overlook and view into private premises without receiving prior consent from the occupiers of those premises.

2.9 The General Manager will seek advice on all requests from the organisations Data Protection Officer contact details are included within the companies Data Protection Policy.

3. **Responsibility of the Operators of the System**

3.1 The Operators of the system shall have prime responsibility for:

- a) compliance with the purpose and objectives of the system.
- b) operation and security of the system.
- c) the protection of the interests of the public and of the individual as far as is practical.
- d) the compliance with this Code of Practice.
- e) compliance with all legislation pertaining to the use of the system.

4. **Statement of Purpose**

4.1 **Purpose**

The purpose of this document is to state how the Beatles Story intend to use the CCTV System to meet the objectives and principles outlined in Section 2.

4.2 **General Principles of Operation**

The CCTV System will be operated fairly, within the law and only for the purposes for which it was established, and which are identified within this code, or which are subsequently agreed in accordance with this code.

The CCTV System will be operated with due regard to a general right to respect for an individual's private and family life and their home, as set out in Article 8 of the HRA.

The public interest in the operation of the CCTV system will be safeguarded by ensuring the security and integrity of operational procedures.

Throughout this Code of Practice, it is intended, as far as reasonably possible, to balance the objectives of the CCTV System with the need to safeguard the individual rights. Every effort has been made throughout the Code to indicate that a formal structure has been put in place, including a complaints procedure, by which it can be identified that the system is not only accountable but is also seen to be accountable.

Participation in the system by any organisation, individual or authority assumes an agreement by all such participants to comply fully with this code and to be accountable under the Code of Practice.

4.3 Monitoring and Recording Facilities

The CCTV System uses a number of digital network video recorders located at The Beatles Story, Albert Dock premises. These devices record all camera feeds from The Beatles Story system according to network design and architecture.

Access to recorded data is recorded on the systems log and user credentials are logged as part of this data recording. The purpose of this is to audit which operator has bookmarked specific footage. Recording of footage will be heavily restricted to a small number of Officers (currently the Operations Team, Security/GSO team and the General Manager). Viewing of live footage will only be allowed by appropriate officers following appropriate justification and duly recorded on the CCTV request form located on the company's online platform. All requests will be approved by the General Manager.

Monthly audits will be administered by the Operations Manager and all data logs will be shared with the General Manager. Access log records will be checked against the CCTV request form. Access logs that have not been authorised via the CCTV request form on the company's online platform will be highlighted and investigated.

4.4 Training

Staff will be suitably trained and authorised visitors will not have access to the monitoring facility without an authorised member of staff present at all times.

4.5 Processing and Handling Recorded Material

No recorded material whether recorded digitally, in analogue format or as a hard copy video print, will be released unless in accordance with this Code of Practice and relevant legislation.

4.6 Changes to the Code

This Code of Practice will be subject to regular review to ensure that it reflects best practice and responds to changes brought about by legislation. Any major changes to the Code of Practice will take place only after consultation with and upon agreement of The Beatles Story board. Minor changes will be made by the Operations Manager and authorised by the General Manager, on behalf of The Beatles Story.

A major change is one which will have a significant impact upon the Code of Practice or upon the operation of the CCTV System. A minor change is one which, for example may be required for clarification or which arises as a result of technical changes to the CCTV system and will not have any major implications.

Any change to the Code that may have an impact upon the manner in which the Code affects the Beatles Story staff, in respect of potential disciplinary investigations or procedures will be the subject of agreement with the trade unions in advance of its implementation.

4.7 Breaches of the Code of Practice and Security

Prime responsibility for the Code of Practice and for security surrounding the system rests with The Beatles Story LTD.

This responsibility includes ensuring that breaches are investigated, reported and remedied in accordance with the Data Protection Policy.

Responsibility for security on a day-to-day basis rest with the Operations Manager. Major breaches of the Code of Practice will be reported to the companies Data Protection Officer by the General Manager and investigated by the companies Data Protection Officer, and they shall have responsibility for making recommendations to remedy any major breach which is proved. The Data Protection Officer will be responsible for the reporting of breaches to the Information Commissioner when appropriate. If a criminal offence is disclosed, then the matter will be referred to the relevant Law Enforcement Agencies.

5. Privacy and Data Protection

5.1 Public Concern

Although the majority of the public at large may have become accustomed to “being watched” those who do express concern do so mainly over matters pertaining to the processing of the information (or data) i.e., what happens to the material that is obtained.

All personal data obtained by virtue of the System shall be processed fairly and lawfully and in particular shall only be processed in the exercise of achieving the stated objectives of the System. In processing personal data, a person’s right to respect for his or her private and family life and their home will be respected in accordance with Article 8 of the HRA.

The processing, storage and security of the data will be strictly in accordance with the requirements of the DPA 2018, the GDPR and additional locally agreed procedures.

5.2 Data Protection Legislation

On 25th May 2018 the DPA 1998 was replaced by the GDPR and the DPA 2018 as the UK's data protection legislation. Upon the United Kingdom's withdrawal from the EU, the contents of GDPR were adopted as the (UK) General Data Protection Regulation.

The operation of the System has been notified to the Information Commissioner's Office in accordance with the requirements of the DPA. Merseytravel's registration number is Z741948X.

The "controller" for the System is The Beatles Story and day to day responsibility for the data will be devolved to the Security Team.

All personal data will be processed in accordance with the principles contained in Article 5 of the GDPR, which state that personal data will be:

- a) processed fairly and lawfully.
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes.
- c) adequate, relevant, and limited to what is necessary in relation to the purposes for which they are processed.
- d) accurate and, where necessary, up to date.
- e) kept in a form which permits identification of data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

5.3 Requests for Information (Subject Access)

Any request from an individual for the disclosure of their personal data which they believe is recorded by virtue of the System should be directed in the first instance to The Beatles Story email (enquires@beatlesstory.com). The General Manager without exception will then inform the Senior Information Management Officer if any footage is held, who will respond to the requester.

The principles of the DPA 2018, the GDPR and the FOIA shall be followed in respect of every request.

If the request cannot be complied with without identifying another individual, permission from that individual must be obtained unless it is reasonable in all the circumstances to comply with the request without

the consent of that individual.

Any person making a request must be able to satisfactorily prove their identity and provide sufficient information to enable the data to be located.

6. **Accountability and Public Information**

6.1 The Public

For reasons of security the confidentiality access to The Beatles Story CCTV is restricted in accordance with the Code of Practice.

A member of the public wishing to register a complaint with regard to the System may do so by contacting The Beatles Story Ltd.

All complaints shall be dealt with in accordance with The Beatles Story's complaints process, all complaints will be sent to the General Manager for review.

Any performance issues identified will be considered under the organisations Disciplinary Procedures to which all employees, including CCTV personnel, are subject.

Concerns about The Beatles Story's use of personal information can be directed to DPO@liverpoolcityregion-ca.gov.uk.

6.2 Public Information

A copy of this CCTV Code of Practice shall be published on The Beatles Story's website.

6.3 Signs

Signs (see Appendix 2) will be placed in the locality of the cameras and at main entrance points to the relevant areas. The signs will indicate:

- the presence of CCTV monitoring.
- the 'Ownership' of the System.
- contact telephone number 0151 709 1963

6.4 Fair Processing Notice

The GDPR requires certain additional information to be communicated to the public when their information is collected.

The full Fair Processing Notice for The Beatles Story CCTV system can be found at Appendix 4.

7. **Assessment of the System and Codes of Practice**

7.1 **Evaluation**

The System will, periodically, be evaluated to establish whether the purposes of the System are being complied with and whether objectives are being achieved in addition to compliance. The Site Operational Assessments for all areas will be completed by the Operations Manager and all justifications will be forwarded to the General Manager for review. The General Manager will raise any concerns with the Senior Information Management Officer.

7.2 **Monitoring**

The Operations Manager/ Guest Service Officers will accept day to day responsibility for the monitoring and operation of the System and the implementation of this Code of Practice.

7.3 **Audit**

There will be monthly audits of the operation of the System which will include examination of The Beatles Story's records, media histories, the content of recorded materials and site visits across the sites by the Operations Manager.

8. **Employment Matters**

8.1 **Monitoring of Employees using CCTV**

The Beatles Story is a responsible and reasonable employer and, as such, will ensure that monitoring using CCTV will be reasonable and proportionate. There is a legitimate expectation that employees' personal lives will remain private and that their normal competence within the job role will be assumed. The employer will trust the employees as far as is reasonably practical.

Use of CCTV for the purpose of monitoring employee activity, in order to investigate matters of potential misconduct or potential breaches of health and safety procedures will only be undertaken within the spirit of this understanding and in accordance with this Code of Practice.

Such monitoring is allowed under GDPR as it represents the processing of personal data as part of a contract between The Beatles Story and the employee. However, it is recognised that failing to follow the agreed procedures as detailed within this Code of Practice may result in any evidence collected being rendered as inadmissible for disciplinary purposes.

Any breach of this procedure will lead to an investigation and could result in disciplinary action. Managers should also be aware that a breach of the data protection legislation related to accessing CCTV footage may lead to prosecution of the individual The Beatles Story as the employer.

When deciding whether or not to request and subsequently view CCTV footage, consideration will be given as to whether it is proportionate and reasonable to view the footage when balanced with the interests, rights and freedoms of employees.

Those undertaking any investigation, and considering the use of CCTV footage, should satisfy themselves that they have appropriately answered the following questions;

- i) Am I being mindful of the Beatles Story's Policies, Guidelines and Code of Practice and the relevant legislation and regulations?
- ii) Is this proportionate action?
- iii) Can this investigation be reasonably and fairly completed without the use of CCTV footage?
- iv) What is the precise purpose of observing the CCTV footage?
- v) Have I obtained the approval from the General Manager for the use of CCTV footage prior to undertaking the viewing of footage?
- vi) Have I approached the CCTV System Administrators or one of the designated controllers in the correct manner?
- vii) Have I notified the employee of my intention to view CCTV footage?
- viii) Have I notified the HRD with my request to access CCTV footage.
- ix) Has the CCTV Impact Assessment been fully completed and approved? (See Paragraph 8.5)
- x) Is the request specific? Footage will not be provided for different dates or timelines without the required forms being completed.

8.2 CCTV Operators

Data controllers or system Administrators will not be permitted to use the CCTV system until they have received suitable training and are familiar with this Code of Practice.

Every person involved in the management and operation of the System will be personally issued with a copy of the Code of Practice. They will be required to sign confirming that they fully understand their obligations to adhere to this Code of Practice (issued electronically via the companies E-Learning platform).

8.3 Breach of the Code of Practice

Any breach of this Code of Practice by either those requesting or giving access to CCTV footage, or any breach of confidentiality will be dealt with in accordance with the organisation's disciplinary procedure.

8.4 Use of CCTV in potential disciplinary proceedings

CCTV footage captured by the system may be used for the purposes of disciplinary investigations in accordance with the Disciplinary Policy or to investigate potential health and safety breaches.

Access to CCTV will only be granted when it is a proportionate and necessary means of detecting the conduct in question. This will be decided by means of a CCTV Impact Assessment (see Appendix 5).

The procedure to be followed in order to access CCTV footage is:

- i) The Manager identifies the specific locations, time, behaviour, and staff to be observed, via the CCTV system.
- ii) The Manager completes the Impact Assessment form located in appendix 5 and email this to the General Manager and copying in humanresources@beatlesstory.com
- iii) Any request made by the General Manager are to be approved by the Assistant Director of Customer Service Delivery. It should be noted that giving authorisation for CCTV footage to be viewed does not preclude the General Manager/ Assistant Director of Customer Service Delivery involvement in any subsequent disciplinary proceedings.
- iv) The submitted Impact Assessment form is considered by the HRD (or nominated deputy). A copy of the form is saved and logged in the employees People HR documents with only Administrator access to the system.
- v) The HRD (or nominated deputy) returns the Impact Assessment form to the manager, confirming the outcome of the impact assessment.
- vi) Once the Impact Assessment has been returned to the Manager with approval, they are to complete the CCTV request form on the online system.

#	CATEGORY	QUESTION	RESPONSE	COMMENTS	RISK	DOCUMENTS
1	CCTV	Person Requesting - Full Name ?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
2	CCTV	Person Requesting - Job Title ?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
3	CCTV	Please detail why you are requesting this footage?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
4	CCTV	Which site are you requesting footage for? ?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
5	CCTV	Which department is the CCTV from?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
6	CCTV	Please provide the date, time and duration of the CCTV requesting? ?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
7	CCTV	Please provide details of the incident to help to locate on CCTV ?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
8	CCTV	Please confirm that the details provided are correct. ?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)
9	CCTV	Please select yes to confirm submission for approval to General Manager - Mary Chadwick ?	<input type="text" value="Please Select"/>	<input type="text"/>		Documents (0)

- vii) Manager informs the employee that CCTV footage will be viewed as part of the investigation to establish the facts. This will normally take the form of an investigation meeting where the manager will be accompanied by a representative of the HRD. The employee will be asked to digitally sign the CCTV Impact Assessment form released on People HR after the meeting to confirm that they have been informed that CCTV will be viewed.
- viii) Manager emails the data controller quoting the original CCTV reference number to request that the footage be copied to a USB. The manager must ensure that the footage is viewed in a location which ensures confidentiality and is only viewed by the investigating officer and HRD representative. Where no further action is taken, the footage will be destroyed by returning the USB to the General Manager for confidential and secure shredding witnessed by a representative of the HRD; where the investigation results in a disciplinary warning, the footage will be retained, along with other disciplinary records, for the duration of any disciplinary tariff awarded, or for six years following termination of employment, after which time the footage will be destroyed;
- ix) If something is viewed which is to be investigated further, the employee must be given the opportunity to view the footage.

8.5 Supplementary Footage or Incidents

The manager must only view the CCTV footage of the actual alleged incident within the date and timeframe as detailed within the approved CCTV Impact Assessment. Viewing additional footage or “fishing” for further acts of misconduct will be considered as a breach of this Code of Practice. The data control officer hosting the visit to the CCTV Data Management will refuse any request if it falls out of the parameters of the original request.

CCTV must only be viewed to fulfil its original purposes. If the manager views a different incident to that originally being investigated, either concerning the same employee or another employee, they are required to treat this as a completely separate incident and follow the procedure detailed in 8.5, from point iii) onwards. This includes situations where the footage was originally viewed for purposes not related to employees, e.g. investigating a customer complaint

9. Control and Operation of Cameras

9.1 Guiding Principles

Any person operating the cameras will act with utmost integrity and respect at all times without exception.

9.2 Maintenance of the System

To ensure compliance with the Information Commissioner’s Code of Practice that images recorded continue to be of appropriate evidential

quality, the Beatles Story's CCTV System shall be maintained by the Operations Manager

The maintenance programme will make provision for regular/periodic service checks on the equipment which will include cleaning of any all-weather domes or housings, checks on the functioning of the equipment and any minor adjustments that need to be made to the equipment settings to maintain quality.

The maintenance will also include regular periodic overhauls of all the equipment and replacement of equipment which is reaching the end of its serviceable life. The Operations Manager will provide the General Manager a maintenance schedule annually verifying all actions have been completed.

Documents relating to the maintenance of the system must be kept for future checks.

In addition, the Operations Manager will provide a bi-monthly reports to the General Manager detailing any CCTV-related faults that have been reported, what actions have been taken to address the fault and if any issues remain outstanding, please see Appendix for full example of the checks completed.

GSO will carry out a daily morning check of the CCTV, to ensure that all images are showing on the screens, including correct date and time is displaying.

The one system has 5 DVR/NVR recorders that cover both Albert Dock and Pier Head sites.

Each DVR/NVR is assigned a number 1,2,3,4, Albert Dock and 5 is Pier Head

Each morning the Security/GSO team will log onto the CCTV to carry out the daily visual check.

The checks are to be completed on each of the 5 DVR/NVR's include

- Check date displayed on camera (showing the correct date)
- Check time displayed on camera (showing the correct date)
- Check each camera is displaying an image clearly.

Once the daily check has been completed the Security/GSO team will complete the digital checklist. Detailing the outcome of the checks and highlighting any faults.

#	CATEGORY	QUESTION	RESPONSE
1	CCTV	DVR 1 - Is the date and time correct and displayed? Is the image displayed clearly on each camera?	Please Select
2	CCTV	DVR 2 - Is the date and time correct and displayed? Is the image displayed clearly on each camera?	Please Select
3	CCTV	DVR 3 - Is the date and time correct and displayed? Is the image displayed clearly on each camera?	Please Select
4	CCTV	DVR 4 - Is the date and time correct and displayed? Is the image displayed clearly on each camera?	Please Select
5	CCTV	NVR 1 - Is the date and time correct and displayed? Is the image displayed clearly on each camera?	Please Select
6	CCTV	Pier Head - Is the date and time correct and displayed? Is the image displayed clearly on each camera?	Please Select

#	ISSUE	CATEGORY	RATING	FILES
No data available in table				

Security/GSO team will contact the Operations Manager at the earliest opportunity and inform them of any faults. In the absence of the Operations Manager the General Manger should be informed.

9.3 Amendments to system are only to be completed following authorisation of system owner. Due process including DPIA and updated CCTV surveillance commissioner self-assessment.

10. Access Arrangements and Security of The Beatles Story's CCTV Equipment Areas.

Access and security arrangements to The Beatles Story shall as a minimum comply with the following:

- Access to The Beatles Story's Comms room containing the CCTV recording equipment is strictly controlled by fob access and only those persons authorised are allowed access. Authorized staff into this room are GSO (Security Team), Operations Team, General Manager and Guest Experience Management team including Team Leaders.
- The CCTV records (DVR's and NVR's) are kept in a locked cabinet and the key is kept with the Key Box Safe 4 located in the Security Office and is signed in and out.
- A detailed record will be maintained of visitor/contractors to the Comms room containing the CCTV recording equipment will be kept. Access to the area will be authorised by the Operations Manager only. Security Team will be responsible for checking formal identification before access is given.
- Access for visitors to view the system will only be permitted by the General Manager and controlled at all times.
- All Data Controller have access to the system via a Username and Password. This information is private and confidential and must not be shared.

11. Management of Recorded Material

11.1 Principles

For the purpose of this Code 'recorded material' means any material recorded by or as the result of technical equipment which forms part of the System but specifically includes images recorded digitally or on hard drive or by way of DVD copying including prints.

Every recording on hard drive or on DVD obtained by using the System has the potential of containing material that may need to be admitted in evidence at some point during the period of its retention.

Recorded material will not be copied, sold, otherwise released or used for commercial purposes or for the provision of entertainment or otherwise made available for any use incompatible with this Code of Practice.

12. **Digital Image Recording Procedures**

12.1 Adhering to the agreed management and operational procedures is crucial if the digital recordings produced are to be of sufficient evidential value and quality that they can be used for evidence to be produced in court.

Time lapsed digital images are automatically recorded and are kept for 30 days on the hard drive of the recording equipment after which time the images will be overwritten.

For evidential purposes each recorded image downloaded should have the correct time and date automatically embossed on it, therefore it is essential that Operators quality assure data.

If a request for access to recorded images is made within the 30 days then only copies of the images that have been specifically requested can be "bookmarked".

Footage once downloaded is stored with a private secure folder on The Beatles Story network, that is only accessible by the General Manager, Operations Team and the Security/GSO Team.

12.2 **Digital Recording & Copying Procedure**

On receiving a request to view a digital recording of a particular incident, the following process should be followed:

To preserve the continuity of evidence an entry will be created on the CCTV database for any copy of digital recording made or saved onto the System thereby creating a CCTV reference number.

The report should include the following:

- name, rank or title of the person requesting the copy.
- organisation that the person represents.
- incident type e.g., assault, theft etc.
- date time and location of the incident.
- any additional information applicable.

Each digital image recording released should be clearly identified with the relevant incident report number, date and time and date of the incident.

It is important to stress to the recipient of digital image recordings that the images will at all times remain the copyright of The Beatles Story LTD. Therefore, no images should be released either wholly or partially to a third party without the written consent of the General Manager. A record of all data released will be kept for a period of 2 years.

- 12.3 Any viewings of live or recorded images will be entered onto a CCTV Audit register on the E- Learning system. This will be updated by the person(s) authorising and include details of all camera names viewed, date, time, and the purpose of viewing.

Appendix 1

System Owners

The Beatles Story LTD
Unit 41
Britannia Pavilion
The Royal Albert Dock
Liverpool
L3 4AD

Tel: 0151 709 1963
Email: enquiries@beatlesstory.com.

Responsibilities

- The Operations Manager will ensure the provision and maintenance of all equipment forming part of the Beatles Story's CCTV System in accordance with contractual arrangements which the owners may from time to time enter into. This will ensure service availability and compliance.
- All appropriate internal stakeholders must maintain close liaison with the System Administration Manager.
- Ensure the interests of the owners and other organisations are upheld in accordance with the terms of this Code of Practice.
- Agree to any proposed alterations and additions to the System and this Code of Practice.

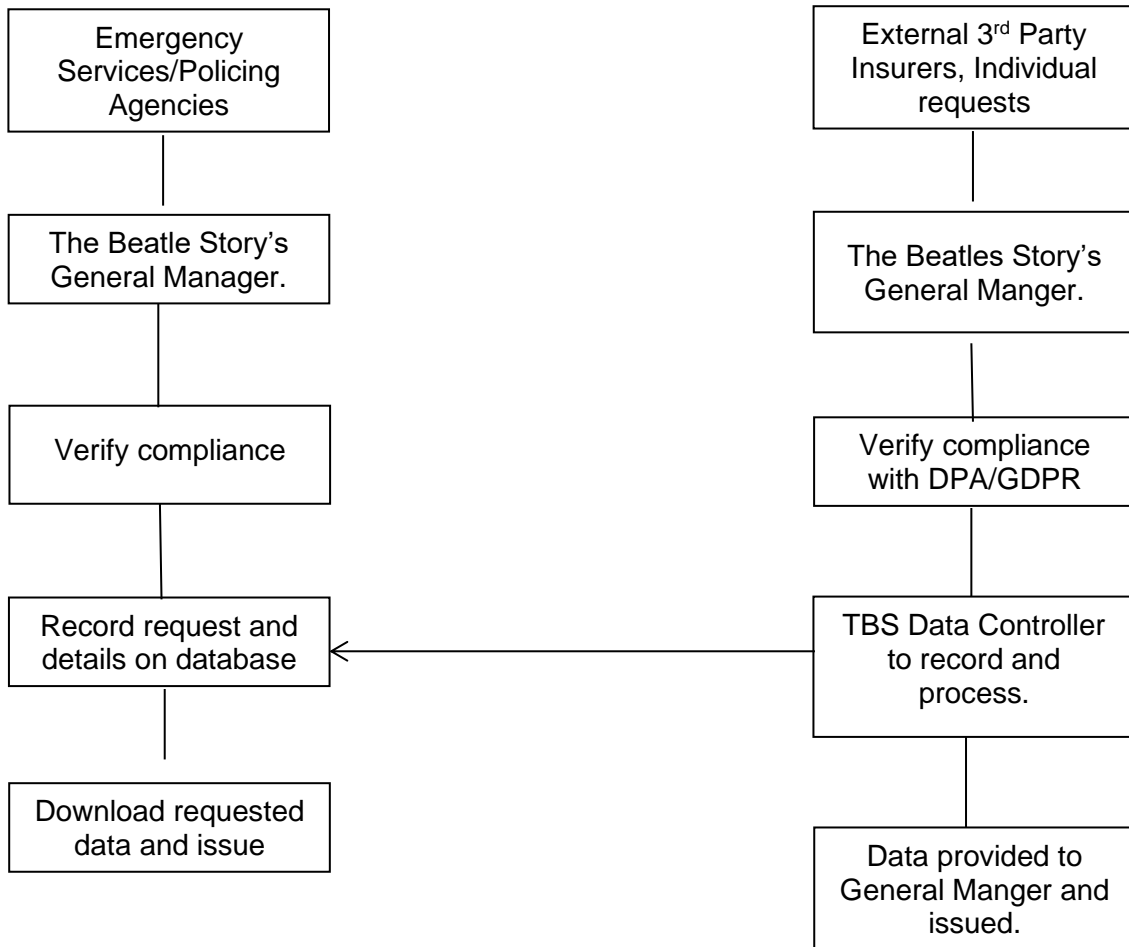
Appendix 2



Appendix 3

External CCTV Request Handling Flowchart

The General Manager will seek advice from the DPO as and when needed.



Appendix 4

CCTV Fair Processing Notice

Identity and contact details of the controller and where applicable, the controller's representative and the data protection officer

The Beatles Story is the 'controller' for your personal information. This means that we decide the purpose and means of how the data captured by the CCTV system is processed.

If you have any questions about how your information is being used, you can contact The Beatles Story's Data Protection Officer at

DPO@liverpoolcityregion-ca.gov.uk

0151 330 1679

1 Mann Island, Liverpool, L69 3HN

Purpose of the processing and the legal basis for the processing

The CCTV system is used by The Beatles Story as outlined in Clause 2.1 of this Code. We are able to do this as part of our legal obligations as an employer.

Description of the categories of personal data

The categories of information being processed include your image.

The CCTV system does not process any 'special categories' personal data.

Any recipient or categories of recipients of the personal data

Your information will be shared as allowed by the GDPR and the Data Protection bill with parties such as the Police and solicitors for the purposes of criminal investigation and legal proceedings.

Details of transfers to third country and safeguards

Your personal data will not be transferred outside the European Economic Area.

Retention period or criteria used to determine the retention period.

The CCTV footage will be kept for a period of 30 calendar days from the date of capture. If a request is received within this time to "bookmark" the footage, this will be retained for a period of three months. When the footage is burned to disc for disclosure, a master copy will be retained. For Crown Court or criminal cases, the master copy is retained for seven years due to the legal requirement to retain related information. For all other disclosures a master copy is retained for one year. This retention has been determined by The Beatles Story's business need.

The existence of each of data subject's rights

The GDPR provides you with the following rights when it comes to your personal data:

- The right to be informed how your personal data is being processed.
- The right of access to the personal data we hold about you, which includes providing copies of the information to you within one month of a request. We may charge a reasonable fee to provide this information based on our administrative costs of responding (i.e. photocopying, postage, etc.).
- The right to rectification of any incorrect or incomplete data we hold about you.
- The right to erasure, also known as 'the right to be forgotten', where,
 - Your information is no longer required for the purpose it was collected.
 - You withdraw your consent.
 - You object to Merseytravel processing your information (and there is no overriding legitimate interest for continuing the processing)
 - Merseytravel has breached the GDPR when processing your data.
 - There is a legal obligation to delete the data (such as a court order)
- The right to restrict processing, which limits what Merseytravel can do with your information.
- The right to data portability, where any automated processing of your information based on your consent or as part of a contract is made available for your reuse.
- The right to object to direct marketing or any processing based on the performance of a task in the public interest/exercise of official authority or for the purposes of scientific/historical research and statistics.
- Rights in relation to automated decision making and profiling, where a decision made by a computer has a legal or significant effect on you.

For further details, or to exercise any of your rights, contact the Data Protection Officer.

DPO@liverpoolcityregion-ca.gov.uk

0151 330 1679

1 Mann Island, Liverpool, L69 3HN

The right to lodge a complaint with a supervisory authority.

You have the right to lodge a complaint regarding the processing of your personal data to the UK's supervisory authority, the Information Commissioner, who can be reached using the details below:

The Information Commissioner's Office,
Wycliffe House,
Water Lane,
Wilmslow,
Cheshire SK9 5AF
www.ico.gov.uk
0303 123 1113

Appendix 5

CCTV Impact Assessment Form: Employment

This form is to be used prior to making a request to access CCTV footage as part of a potential disciplinary investigation or investigation into breaches of health and safety.

Please refer to the CCTV Code of Practice for further guidance and to ensure compliance with the process. You may ask for the footage to be “bookmarked” however you must not access the footage at this stage and must specify the location, date, and timeframe to be bookmarked.

By completing the CCTV request form on the E’ Learning system

You must digitally fill in this form and submit you request to the General Manger via email and also copying in humanresources@beatlesstory.com.

On approval from the General Manager the form will be returned to the manager requesting CCTV. The manager will the complete the CCTV request form on the online digital system and submit, once approved the request will be issued to one of the data controllers of The Beatles Story LTD.

1. What is the purpose of accessing the CCTV footage? Please provide as much detail as possible, including:
 - the name(s) of the employee(s) concerned.
 - details of the actions/activities/incidents to be observed;
 - the alleged misconduct/breach of procedures.

2. Specify the location, date and timeframe to be viewed.

3. Are there any likely adverse impacts to viewing the CCTV footage?

4. Are there any viable alternatives to viewing the CCTV footage? Please explain your rationale for discounting any alternative methods.

5. Has the CCTV footage been viewed previously for a different purpose?

Yes No

If yes, please indicate the date that you signed the previous request: _____

By submitting this form, you are agreeing that you understand and will abide by the rules related to accessing CCTV for employment purposes.

Additional Footage After Initial Request Approved

If you need to view additional footage, you must complete and submit a further impact assessment.

Email your request to the General Manager copying in the HRD humanresources@beatlesstory.com

This email will contain the below –

- Completed by (name):
- Job Title
- Digital Signature:
- Date

For Completion by General Manager

Digitally approve the request via email copying in the manager requesting the footage and the HRD humanresources@beatlesstory.com.

This email will contain the below –

- Digital Signature
- Job Title
- Date:

For completion by Head of HRD

Comments on the application

Does the impact assessment justify the accessing of CCTV footage for the date and timeframe indicated?

Yes No

Digitally approve the request via email copying in the manager requesting the footage and the General Manager.

This email will contain the below –

- Review by (name):
- Job title:
- Date:
- Digital Signature:

HRD: Retain a copy of this form on the employees People HR documents with restricted access to Administrators only.

EXTERNAL REQUEST FORM
CCTV Data Management Information Request

This form must be completed in full and emailed to: enquires@beatlesstory.com marked for the attention of The Beatles Story General Manager for authorisation.

Requester Details:

Name			
Rank/Position		Collar Number	
Police Force/Agency/Organisation		Position	
Date of Request			

Incident Details:

Date of Incident		Time	
Location			

Reason(s) for Request
Police Force/Agency/Organisation Log Number

Brief Incident Details

Tel. Number & Email (Required for contact purposes and/or verification)	
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(Please note that this email address must match the requester's details)
 *** Data Format – UBS only **

The Beatles Story LTD USE ONLY

Authorised:		Signature:	
Date Completed:		CCTV Ref:	
Camera Numbers:			

