Blackwater Sailing Club



BSC CCTV POLICY 2022

Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Blackwater SC. The system comprises of a number of fixed cameras located on the mast in the car park and on/in the club building. All cameras are controlled from the Office and the system can only be accessed by the nominated Security Officer. The Club owns the CCTV system. The Policy will be subject to review by the Management Committee. This Policy follows the Data Protection Act guidelines.

Objectives of the CCTV Policy

- To help protect the club buildings, equipment and members' property stored at the club
- To support the Police in a bid to deter and detect crime
- To assist in identifying, apprehending and potentially prosecuting offenders

Statement of intent

The CCTV Scheme has been registered with the Information Commissioner under the terms of the Data Protection Act 1998 and seeks to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. The Club will treat the system and all information, documents and recordings obtained and used as data protected by the Act. Cameras will be used to monitor activities within the Club grounds to identify adverse activity actually occurring, anticipated or perceived. Static cameras are positioned to ensure they do not focus on private homes, gardens and other areas of private property. At no time will a camera be directed to follow or track an individual as all the currently deployed cameras are fixed. Materials or knowledge secured as a result of CCTV use will not be used for any commercial purpose.

Images will only be released for use in the event of:

- An investigation of a specific crime with the written request of the police.
- A legitimate written request from a Member or their authorised agent to investigate a
 civil dispute in respect of the condition of Members' property stored at the club.
 Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the CCTV Scheme will give maximum effectiveness and efficiency within available means, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage. Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at all access routes to areas covered by the Club's CCTV system.

Operation of the system

The CCTV system will be administered and managed by the Club in accordance with the values and objectives expressed in the code. The day to day management will be the delegated responsibility of the Security Officer. The CCTV system will operate 24 hours each day, every day of the year. The images captured will be retained for a maximum of 30 days except where an image identifies an issue and is retained specifically in the context of an investigation or Subject Access request.

Control and Liaison

The system provider will periodically check and confirm the efficiency of the system and, in particular, that the equipment is properly recording and that cameras are functional. The Club will liaise with the supplier regarding servicing and/or repairs and maintenance of the system.

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Monitoring procedures

Camera surveillance is maintained at all times and up to 30 days movement activated footage is held on the system memory. To maintain and preserve the integrity of any DVD/Video/Media file (hereinafter 'the recording') used to store data from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention will be strictly adhered to:

- (a) Each **Recording** must be identified by a unique reference number and not stored with any other media.
- (b) The person responsible for the **Recording** will register the date and time and file reference number.
- (c) Each Recording required for evidential purposes must be securely stored. Any Recording created must be sent to the Honorary Secretary who will maintain a record of the original and ensure only authorised parties are sent copies and that the responsibility for handling under the Data Protection Act is both expressed and incumbent on the recipients.

 d) The Honorary Secretary will maintain a record of any Recording released to the Police or
- d) The Honorary Secretary will maintain a record of any **Recording** released to the Police or other authorised applicants.
- e) Viewing of footage by the Police or any external individual must be recorded in writing. Requests by the Police can only be authorised under section 29 of the Data Protection Act 1998 may be released under the procedures described in this paragraph of this Code.
- f) Images will only be released to the Police on the clear understanding that the **Recording** remains the property of the Club, and the images on it are to be treated in accordance with this code. The Club also retains the right to refuse permission for the Police to pass to any other person the **Recording** or any part of the images contained thereon.
- g) The Police may require the Club to retain any stored **Recordings** for possible use as evidence in the future. Such **Recordings** will be properly indexed and securely stored until the Police need them.
- h) Applications received from outside bodies (e.g. solicitors) to view or release footage stored on **Recordings** will be referred to the Hon. Secretary. In these circumstances **Recordings** will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, by an insurance company or in response to a Court Order. A fee may be charged in such circumstances.

Breaches of the code (including breaches of security)

The Hon. Secretary will initially investigate any breach of the Code of Practice by the Security Officer or any other Club member.

Complaints

Any complaints about the Club's CCTV system should be addressed to the Hon. Secretary. Complaints will be dealt with in accordance with the ICO Code of Practice.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about them, including those obtained by CCTV. Requests for Data Subject Access should be made through the Hon. Secretary. The Club reserves the right to make a charge of up to £10 (currently the statutory amount as permitted by Parliament).

Public information

Copies of this policy are available for download to the public from the Club website.