

Knightsote Model Boat Club

CCTV Operation Policy



General Statement of Knightsote Model Boat Club's Duties and Scope

Knightsote Model Boat Club is registered with the Information Commissioner's Office under the Data Protection Act as a Data Controller, (Registration Number: ZA258617), with the Club Secretary nominated as the Data Controller and named in the registration.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 1998, the Amended Surveillance Code of Practice March 2022 and the General Data Protection Regulations.

The Club's CCTV facility records images only. There is no audio recording i.e. conversations are not recorded on CCTV.

1. Definitions

- 1.1. The Club is Knightsote Model Boat Club
- 1.2. The Data Controller (DC) is the person that must exercise control over the processing of Data and carry data protection responsibility for it. This shall be the Secretary.
- 1.3. The Data Processor (DP) processes data on behalf of the Data Controller. The Club has nominated the Chairman to act as the CCTV Data Processor.
- 1.4. A Data Subject is a Club Member whose personal data is held by the Club.
- 1.5. DVR is a Digital Video Recorder or other similar device for recording CCTV images

2. Purposes of CCTV

2.1.1. The purposes of the Club installing and using a CCTV system are:

- To assist in the Health and Safety of the site, our members and visitors.
- To assist in the prevention or detection of crime or vandalism.
- To assist in the identification and prosecution of offenders.
- To monitor the security of the Clubhouse and surrounding areas.

3. Location of cameras

3.1. Cameras are located at strategic points externally to the Club's Clubhouse and sailing water. They are principally at the entrance and exit points and overlooking the access to the toilets and storage areas, which are obscured from general view. The Club has positioned the cameras so that they mostly cover external communal areas on the Club's premises and they have been sited so that they provide clear images. Cameras are also installed inside the Clubhouse, to provide recordings for security purposes. No camera focuses on private internal areas e.g. the toilets. All cameras are also clearly visible.

3.2. Appropriate signs are prominently displayed so that members and other visitors are aware they are entering an area covered by CCTV.

4. Processing of CCTV Data

- 4.1. The Club has nominated the Club Secretary as the DC.
- 4.2. The DC has nominated a Club member as the CCTV DP.

- 4.3. These two people shall be only people authorised by the Club to operate and process data from the CCTV system.

5. Recording and retention of images

- 5.1. Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing good quality images.

- 5.2. Images are mostly recorded in motion detection real-time (Operational 24 hours a day throughout the year).

- 5.3. As the recording system records digital images, any CCTV images that are held on the hard drive of the DVR are deleted and overwritten on a recycling basis of approximately 8 days. Once a hard drive has reached the end of its use it will be erased and physically rendered inoperable, prior to disposal.

- 5.4. Images that are stored on, or transferred onto removable media such as CDs and retained by the Club, 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.

6. Access to and disclosure of images

- 6.1. Access to, and disclosure of, images recorded on CCTV is restricted to the DC and the DP. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected. The Club Chairman (or another senior officer acting in his absence) is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

- 6.2. The images that are filmed are recorded centrally on a DVR which is password protected. Access to recorded images is restricted to the DC (the Club Secretary who is named in the Data Protection Policy), and one other Club member (the DP) who is authorised to view them in accordance with the purposes of the system and this policy. Viewing of recorded images will take place in an area to which other members will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented, and the media kept secure.

- 6.3. 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:

- 6.4. 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.

- 6.5. 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), if requested by them, or their legally recognised representative, and as prescribed within the Acts.
- 6.6. The Committee, where such images may form evidence in an investigation into a potential breach of Club Rules by a member/members. In such cases the Committee shall need to view the images to decide if disciplinary action is necessary.
- 6.7. 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.

7. Individuals' access rights

- 7.1. Under the Data Protection Act 1998 the Amended Surveillance Code of Practice March 2022 and the General Data Protection Regulations, individuals have the right on request to receive a copy of the personal data that the Club holds about them, including CCTV images if they are recognisable from the image.
- 7.2. If a member or visitor wishes to access any CCTV images relating to them, they must make a written request to the Data Controller (the Club Secretary), and the Club reserves the right to charge a fee of £10.00 for the supply of the images requested. The request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and supplied. The Club will respond promptly, but it should be noted that the recordings are deleted and overwritten on a recycling basis of approximately 8 days by the DVR, and any images requested after this time period will not be available.
- 7.3. The Club will always check the identity of the person making the request before processing it, to ensure that the images are only disclosed to a legally authorised person.
- 7.4. The DC will first determine whether disclosure of the images will reveal third party information, as persons 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.
- 7.5. If the Club is unable to comply with the request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, the requester shall be advised accordingly.

8. Covert recording

- 8.1. The Club will NOT undertake any covert recording.

9. Training

- 9.1. The Club will ensure that the DP handling CCTV images or recordings is trained in the operation and administration of the CCTV system and aware of the impact of the Data Protection Act 1998, the CCTV Code of Practice and the General Data Protection Regulations, with regard to the system. This shall be documented for audit purposes.

10. Implementation

The Club's DC is responsible for the implementation of and compliance with this policy and the operation of the CCTV system. A regular review of the Club's use of CCTV shall be undertaken six monthly, and any changes in requirements implemented. Any complaints or enquiries about the operation of the Club's CCTV system should be addressed to them.