



Highcliffe Sailing Club Limited

CCTV Policy

June 2021

Contents

1. Introduction	2
2. Statement of Intent	2
3. Siting the Cameras	3
4. Storage and Retention of CCTV images	3
5. Access to CCTV images	3
6. Subject Access Requests (SAR)	3
7. Access to and Disclosure of Images to Third Parties	4
8. Complaints.....	4
9. Further Information.....	4
Appendix A – CCTV Signage	4

1. Introduction

- a) Highcliffe Sailing Club uses closed circuit television (CCTV) and the images produced to prevent or detect crime and for monitoring buildings and grounds in order to provide a safe and secure environment for its members and visitors, and to prevent loss or damage to Club property.
- b) The system comprises a number of fixed cameras.
- c) The system does not have sound recording capability.
- d) The CCTV system is owned and operated by the Club, the deployment of which is determined by the Committee.
- e) The CCTV is monitored both from the Clubhouse and via a remote access.
- f) Access to the images is controlled by the Clubs Data Protection Officer (Club Secretary) or in their absence, the Commodore and is password protected.
- g) The introduction of, or changes to, CCTV monitoring will be subject to consultation with the Committee.
- h) The Clubs CCTV Scheme is registered with the Information Commissioners Office (ICO) under the terms of the General Data Protection Regulation ('GDPR') and the Data Protection Act 2018 ('DPA2018') and the appropriate fees have been paid.
- i) All authorised Committee members with access to images are aware of the procedures that need to be followed when accessing the recorded images. Through this policy, all operators are made aware of their responsibilities in following the CCTV Code of Practice. The Clubs 'Data Controller' (Club Secretary) will ensure that all the Committee members are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.
- j) This policy will be available on request to all members of the club.

2. Statement of Intent

- a) The Club complies with the Information Commissioner's Office (ICO) CCTV Code of Practice to ensure that CCTV is used responsibly and safeguards both trust and confidence in its continued use.
- b) CCTV warning signs are clearly and prominently placed at the main external entrance to the Club, including further signage in other outdoor areas near camera positions.
- c) Signs will contain details of the purpose for using CCTV (see appendix A). In areas where CCTV is used, the Club will ensure that there are prominent signs placed within the controlled area.
- d) The original planning, design and installation of CCTV equipment endeavoured to ensure that the scheme will deliver maximum effectiveness and efficiency but

it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

- e) The CCTV system will operate 24 hours a day,

3. Siting the Cameras

- a) Cameras are sited so that they only capture images relevant to the purposes for which they are installed (described above) and care will be taken to ensure that reasonable privacy expectations are not violated. The Club will ensure that the location of equipment is carefully considered to ensure that images captured comply with General Data Protection Regulation ('GDPR') and the Data Protection Act 2018 ('DPA 2018').
- b) Members of the Committee will have access to details of where CCTV cameras are situated.

4. Storage and Retention of CCTV images

- a) Recorded data will not be retained for longer than is necessary and is currently restricted to 31 days. While retained, the integrity of the recordings will be maintained to ensure their evidential value and to protect the rights of the people whose images have been recorded.
- b) All retained data will be stored securely at all times and permanently deleted as appropriate/required.

5. Access to CCTV images

- a) Access to recorded images will be restricted to those Committee members authorised to view them and will not be made more widely available.
- b) Images can only be disclosed in accordance with the purposes for which they were originally collected.

6. Subject Access Requests (SAR)

- a) Individuals have the right to request access to CCTV footage relating to themselves under the General Data Protection Regulation ('GDPR') and the Data Protection Act 2018 ('DPA 2018').

- b) All requests should be made to the Club Secretary, in writing. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time, and location.
- c) The Club will respond to requests within one calendar month of receiving the request.
- d) The Club reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

7. Access to and Disclosure of Images to Third Parties

- a) There will be no disclosure of recorded data to third parties other than to authorised personnel such as the Police and any other persons that the Police may deem relevant.
- b) Requests for images/data should be made in writing to the Club Secretary.
- c) Under no circumstances will CCTV images be posted on Social Media.

8. Complaints

- a) Complaints and enquiries about the operation of CCTV within the Club should be directed to the Club Secretary in the first instance.

9. Further Information

Further information on CCTV and its use is available from the following:

- www.ico.org.uk
- Regulation of Investigatory Powers Act (RIPA) 2000
- General Data Protection Regulation ('GDPR')
- Data Protection Act 2018

Appendix A – CCTV Signage

It is a requirement of the Club to notify people entering a CCTV protected area that the area is monitored by CCTV and that pictures are recorded. The Club is to ensure that this requirement is fulfilled.

The CCTV sign should include the following:

- That the area is covered by CCTV surveillance and pictures are recorded
- The purpose of using CCTV
- The name of the Club
- The contact telephone number or address for any enquiries