

The Parklangley Club

CCTV POLICY

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Document Control

Revision History

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THE PARKLANGLEY CLUB

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The Parklangley Club CCTV Policy

1. Introduction

- a) The Parklangley Club uses closed circuit television (CCTV) and the images produced to prevent or detect crime and to monitoring buildings and grounds in order to provide a safe and secure environment for its members, staff and visitors, and to prevent loss or damage to Club property.
- b) The system comprises a number of fixed and dome 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 Club Manager.
- e) The CCTV is monitored centrally from the Clubs main office and media room adjacent to the plant room located on 3rd floor which is where the hardware is located. Access to the images is controlled by the Club Manager, or in his absence, the Assistant Club Manager, and is password protected.
- f) The introduction of, or changes to, CCTV monitoring will be subject to consultation with the Clubs Management Committee and relevant governing bodies.
- g) The Clubs CCTV Scheme is registered with the Information Commissioner under the terms of the General Data Protection Regulation ('GDPR') and the Data Protection Act 2018 ('DPA 2018').
- h) All authorised operators and employees 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 Manager) will ensure that all employees are aware of the restrictions in relation to access to, and disclosure of, recorded images by publication of this policy.

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 in close proximity to camera positions. Signs will contain details of the purpose for using CCTV (see appendix A). In areas where CCTVs used, the Club will ensure that there are prominent signs placed within the controlled area.



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c) 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.

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) The Club will make every effort to position cameras so that their coverage is restricted to the Club premises, which includes outdoor/indoor areas.
- c) Members of staff will have access to details of where CCTV cameras are situated, with the exception of cameras placed for the purpose of covert monitoring.

4. Covert Monitoring

- a) It is not the Clubs policy to conduct 'Covert Monitoring' unless there are 'exceptional reasons' or doing so.
- b) The Club may, in exceptional circumstances, determine a sound reason to set up covert monitoring.
For example:
 - Where there is good cause to suspect that an illegal or unauthorised action(s), is taking place, or where there are grounds to suspect serious misconduct;
 - Where notifying the individuals about the monitoring would seriously prejudice the reason for making the recording.
- c) In these circumstances' authorisation must be obtained from the Clubs Management Committee.
- d) Covert monitoring must cease following completion of an investigation.
- e) Cameras sited for the purpose of covert monitoring will not be used in areas which are reasonably expected to be private, for example toilet cubicles, changing areas etc.

5. Storage and Retention of CCTV images

- a) Recorded data will not be retained for longer than is necessary. 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.

6. Access to CCTV images

- a) Access to recorded images will be restricted to those staff authorised to view them, and will not be made more widely available.

7. 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').



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- b) All requests should be made to the Club Manager, preferably 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.

8. 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 service providers to the Club where these would reasonably need access to the data (e.g. investigators).
- b) Requests for images/data should be made in writing to the Club Manager.
- c) The data may be used within the Club's discipline and grievance procedures as required, and will be subject to the usual confidentiality requirements of those procedures.

9. Complaints

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

10. 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

Example signs used around the Club. Some variations may be used

