

## **DEE SAILING CLUB CCTV POLICY**

Dee Sailing Club is equipped with closed circuit television (CCTV) cameras to monitor our premises and site. This policy sets out how we do that and how we manage the system. If you have any queries about the system, please contact the Honorary Secretary.

Dee Sailing Club CCTV Policy Version 1 (one) March 2023 Dee Sailing Club uses CCTV images to provide a safe and secure environment for members and visitors to the Club's premises as well as to protect the Club's property. This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act and the Information Commissioner's Office CCTV Code of Practice. The Club's CCTV facility records images and sound.

### **PURPOSES OF CCTV**

The purposes of the Club's CCTV installation and uses are to:

- assist in the prevention or detection of crime or equivalent malpractice
- assist in the identification and prosecution of offenders
- monitor the security of the Club's premises and land.

### **LOCATION OF CAMERAS**

Cameras are located at strategic points throughout the Club's premises, principally at the entrance, exit points and overlooking the Club car and boat storage areas. The Club has positioned the cameras so that they only cover communal or public areas on the Club's premises and they have been sited so that they provide clear images. No cameras are sited inside the clubhouse and no camera focuses, or will focus, on toilets or shower facilities. All cameras are clearly visible. Appropriate signs are prominently and clearly displayed so that members and other visitors are aware they are entering an area covered by CCTV.

### **RECORDING AND RETENTION OF IMAGES**

Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images. Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the Club dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than one month. Once a hard drive has reached the end of its use, it will be erased prior to disposal. Images that are stored on, or transferred on to, removable media such as CDs / memory cards or additional hard drives 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.

### **ACCESS TO AND DISCLOSURE OF IMAGES**

Access to live CCTV images is restricted to the following:

- Designated Flag Officers or club members issued with the CCTV app. The primary reason for viewing via the app is to allow the designated viewers the ability to check the club premises remotely in the event that the alarm systems are activated.
- Bar staff who are able to view live images on the monitor behind the bar. The primary reason for this monitor is to allow the bar staff to check anybody trying to enter the club through the main entrance door

Access to, and disclosure of, images recorded on CCTV is restricted. 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, i.e break-in/ security risk, malicious damage, or serious incident. The images that are filmed are recorded centrally and held in a secure location.

Access to recorded images is restricted to a designated person and Flag Officers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other members will not have access when viewing is occurring. All viewing of media when

required, will be documented stating reason for viewing, names of viewers, and or any action taken i.e. recording passed to the police, or other registered authorities, with powers to view such material. The designated officer must obtain permission from the Commodore before releasing any material or showing it to registered authorities.

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:

- 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
- prosecution agencies, such as the Crown Prosecution Service
- relevant legal representatives
- individuals whose images have been recorded and retained and make a valid Subject Access Request (SAR)

The Commodore, Vice Commodore and Honorary Secretary of the Dee Sailing Club are the only people who are permitted to authorise disclosure of information to external third parties such as law enforcement agencies. 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. A formal request in writing must be made on the form provided by the Dee Sailing Club.

#### INDIVIDUALS' ACCESS RIGHTS

Under the Data Protection Act, 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. If you wish to access any of your CCTV images, you must make a written request to the Designated Officer via [secretary@Dee-sc.org.uk](mailto:secretary@Dee-sc.org.uk). Your request must include the date and time when the images were recorded and the location of the particular CCTV camera, so that the images can be located and your identity can be established as the person in the images.

#### COVERT RECORDING

The Club will only undertake covert recording with the written authorisation of the Commodore (or another Flag Officer acting in their absence) where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring may include both video and audio recording. Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease. Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Club cannot reasonably be expected to ignore.

#### FLAG OFFICER TRAINING

The Club will ensure that all personnel handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the Data Protection Act, with regard to that system.

#### IMPLEMENTATION

The Commodore, Honorary Secretary and Designated Officer of Dee Sailing Club are responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct an annual review of the Club's use of CCTV. Any complaints or enquiries about the operation of the Club's CCTV system should be addressed to them.