



# **CCTV POLICY**

## **Introduction**

The purpose of this Policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) system at Blackwater Sailing Club (BSC). The system comprises of a number of cameras located within the BSC grounds and buildings and a System to control those cameras and the storage and management of the recordings.

The BSC owns the CCTV system. This Policy will be subject to annual review by the Honorary Secretary and approved by the Management Committee. This review of the system and equipment is to ensure it meets the needs of the BSC and complies with relevant legislation.

This policy follows the principles outlined in the Data Protection Act 2018.

We have identified and documented the potential impact on individuals' privacy and taken this into account when installing and operating the CCTV system

## **Registration**

The Blackwater Sailing Club has paid the data protection fee to the Information Commissioner's Office (ICO) and is duly registered.

## **Governance**

The objectives of the BSC's use of CCTV are:

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

This policy governs the use of the system and recordings and nominated individuals who are responsible for the operation and maintenance of the system. The day to day management of the CCTV System will be the delegated responsibility of the Security Officer.

The day to day maintenance of the CCTV System will be the delegated responsibility of the system maintainer(s).

The roles of Security Officer and System Maintainer should remain segregated and should not be performed by the same person.

## **Requests for Data**

The BSC 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 BSC grounds, in the vicinity of the access gates to identify adverse activity actually occurring, anticipated or perceived. Cameras inside BSC Buildings are positioned for security purposes in the Upper and Lower Deck Bars, the Entrance and in the Cadet Room and additional areas as required. Images will only be viewed by an authorised individual if an incident or accident occurs and is deemed necessary by a Flag Officer.

Static Cameras are positioned to ensure they do not focus on private homes, gardens or other areas of private property.

At no time will a camera be directed to automatically 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 never be released to the media for purposes of entertainment.

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

- a) an investigation of an incident at the BSC. This will be authorised by the Responsible Flag Officer



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or their Deputy.

b) an investigation of a specific incident or crime at the request of the police or other enforcement agency.

c) A valid request in writing from a Member or their authorised agent to investigate an incident in respect of the condition of Members' property stored at the BSC. This will be authorised by the Responsible Flag Officer or their Deputy.

A request from an external body (e.g. solicitors) to view or release recordings will require authorisation by the Responsible Flag Officer or their Deputy. In these circumstances recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings or in response to a Court Order.

A fee may be charged in such circumstances.

### **Training**

Staff and officers of the BSC have been trained in accordance with this policy and how to recognise legitimate requests for CCTV information/images.

### **Retention**

Where possible, the CCTV system may operate 24 hours each day, every day of the year.

Recordings are activated by the CCTV System's motion detection system.

The system is periodically checked to confirm the functionality of the system and that the equipment is recording and that cameras are operational.

We endeavour to retain recorded CCTV images for long enough to allow for any incident to come to light (e.g. for a theft to be noticed) and to investigate it.

The retention period is normally 30 days, but this may be extended or reduced due to the volume of activity and recordings.

Where an incident has been identified, it is possible to mark recordings in order that they are not removed by the automatic retention and removal function of the CCTV System.

### **Data Quality**

The planning and design have endeavoured to ensure that the CCTV Scheme will be effective and efficient 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.

The system has been designed to detect movement and make recordings of a quality that may fulfil the design requirements. However, it should be noted that factors (such as weather and illumination) may affect this ability.

To maintain and preserve the integrity of the recordings and facilitate their future use, the following procedures will be used:-

a) Recordings should be saved of an event or incident where an access request has been approved and will be kept only for viewing by the relevant authorities.

b) The Security Officer will register the date and time of the recording, including the media file reference number. The Honorary Secretary will also maintain a record of any Digital Media File released to the Police, other enforcement agencies or applicants.

### **Data Security**

The System is installed on a PC that is situated inside the locked office within the BSC building.

Cameras can be controlled from the system located in the Office or remotely (through the same system and controls). The system can only be accessed by the nominated Security Officer and those members with responsibility for maintaining the system.



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We store CCTV Recordings and limit access to authorised individuals and regularly check that the CCTV system is working correctly.

### **Complaints**

Any complaints about the BSC CCTV system should be addressed to the Honorary Secretary. Complaints will be dealt with in accordance with the ICO Code of Practice.

### **Public awareness and signage**

Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at access points and areas covered by the BSC's CCTV system.

### **Related Documents**

Access logs are maintained by the CCTV system to record when access to the system has been made, and by which user. A log is maintained by the Honorary Secretary to record external requests and any action resulting from the request.