



Middleton Sports Club



CCTV POLICY

Middleton Sports Club uses closed circuit television (CCTV) images to provide a safe and secure environment for members, their guests, employees and visitors to the Club's premises (such as clients, customers, contractors and suppliers) and to protect the Club's property.

PURPOSES OF CCTV

The purposes of the Club installing and using CCTV systems include to:

- assist in the prevention or detection of crime or equivalent malpractice
- assist in the identification and prosecution of offenders,
- act as a safeguarding tool for all guests, members and visitors
- monitor the security of the Club's premises
- ensure that health and safety rules and Club procedures are being complied with or investigate accidents
- assist with the identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against employees and to help in providing relevant evidence

LOCATION OF CAMERAS

Cameras are located at strategic points throughout the Club's business premises, principally at the bar, the cellar, car parks and sports competition areas. The Club has positioned the cameras so that they only cover communal or public areas on the Club's business premises and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets or shower facilities. All cameras are also clearly visible and appropriate signs are prominently and clearly displayed so that members, their guests, employees, clients, customers and other visitors are aware they are entering an area covered by CCTV.

RECORDING AND RETENTION OF IMAGES

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 two months. 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, 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. **Any access to footage must be recorded, with the reason for viewing included.** A log is kept for this purpose in the office. If viewed away from the premises, Directors MUST keep a record of viewings as above.

Access to recorded images is restricted to the operators of the CCTV system and to those Directors who are authorised to view them. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring. 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
- Directors or managers involved with Club disciplinary processes
- 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 to the Board of Directors

INDIVIDUALS' ACCESS RIGHTS

Under the Data Protection Act 1998, 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 Board of Directors who reserves the right to charge you a fee of up to £10 for the supply of the images requested. 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.

Note: The Club will always check the identity of the person making the request before processing it.

The Board of Directors of the Sports club will first determine whether disclosure of your images will reveal third party information as you 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.

If the Club is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

COVERT RECORDING

The Club will only undertake covert recording with the written authorisation of the Board of Directors 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. 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.

STAFF TRAINING

The Club will ensure that all employees 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 1998 with regard to that system.

IMPLEMENTATION

The Board of Directors of Middleton Sports 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.