

# MAIDEN ERLEGH BOWLING CLUB

## CCTV Policy Statement

### 1. Policy Statement

- 1.0 Maiden Erlegh Bowling Club (MEBC or Club) uses Closed Circuit TV (CCTV) within the boundaries of its private land. This comprises the area containing the green and part of the inner Car Park. The purpose of this policy is to set out the position of MEBC as to the management, operation and use of CCTV.
- 1.1 The policy applies to all members of the club, visitors to the club and all other persons whose images maybe captured by the CCTV system.
- 1.2 This policy takes account of all applicable legislation and guidance, including:
  - 1.2.1 General Data Protection Regulation (“GDPR”)
  - 1.2.2 Data Protection Act 2018 (together the Data Protection Legislation)
  - 1.2.3 CCTV Code of Practice produced by the Information Commissioner Office (ICO)
  - 1.2.4 Human Rights Act 1998 This Policy sets out the position of MEBC in relation to its use of CCTV.

### 2. Purpose of CCTV

- 2.0 MEBC uses CCTV for the following purposes:
  - 2.0.1 To prevent loss of or damage to MEBC’s buildings and/or assets.
  - 2.0.2 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders.
  - 2.0.3 To monitor possible damage to the playing surface by animals/birds.

### 3. Description of the system

- 3.0 The system consists of three fixed cameras, none of which have sound recording capabilities. They are permanently recording.
- 3.1 The cameras are sited in the following positions:
  - 3.1.1 On the left hand side of the Locker Room/Mower shed when viewed from the green. This covers the gate into the green area next to the clubhouse, clubhouse entrances from the patio and the entrance into the MEBC Lobby. It also covers part of the playing surface.
  - 3.1.2 On the right hand side of the Locker Room/Mower shed when viewed from the green. This covers the path from the other gate into the green area next to the wall and the majority of the playing surface.
  - 3.1.3 On the wall above the gate mentioned in 3.1.2. This covers part of the inner car park up to the clubhouse and the playing surface on either side of the wall between the inner car park and the playing area.

### 4. Privacy Impact Statement

- 4.0 Prior to the installation or repositioning of any CCTV camera, or system, a privacy impact assessment will be conducted by MEBC to ensure that the proposed installation is compliant with legislation and ICO guidance. The assessment will be approved by the Management Committee.
- 4.1 The Club will adopt a privacy by design approach when installing new cameras and systems, taking into account the purpose of each camera so as to avoid recording and storing excessive amounts of personal data.

### 5. Management and Access

- 5.0 The CCTV system will be managed by a member of the Management Committee.
- 5.1 There will be no need to view the live images from the CCTV system as these are images taken from cameras sited on the Mower shed, in which the system is housed.
- 5.2 Recorded images which are stored by the CCTV system will be restricted to the Management Committee under the auspices of the individual identified in 5.0.
- 5.3 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to the disclosure of images.

## 6. Storage and Retention of Images

- 6.0 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 6.1 Recorded images are stored for a maximum of 30 days unless there is a specific purpose for which they require to be retained for a longer period.
- 6.2 MEBC will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
  - 6.2.1 CCTV recording systems being located in restricted access areas;
  - 6.2.2 The CCTV system being encrypted/password protected;
  - 6.2.3 Restriction of the ability to make copies to specified members of staff;
  - 6.2.4 A log of any access to the CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by the club.

## 7. Disclosure of Images to Data Subjects

- 7.0 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 7.1 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation. Such a request should be considered in the context of the MEBC Subject Access Request Policy.
- 7.2 When such a request is made the appropriate individual with access to the CCTV footage (ref 5.0) will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 7.3 If the footage contains only the individual making the request, then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The individual accessing the footage must take appropriate measures to ensure that the footage is restricted in this way.
- 7.4 If the footage contains images of other individuals, then the Management Committee of the Club must consider whether:
  - 7.4.1 The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;

- 7.4.2 The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
  - 7.4.3 If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 7.5 A record must be kept, and held securely, of all disclosures which sets out:
  - 7.5.1 When the request was made;
  - 7.5.2 The process followed by the individual with access to the CCTV footage in determining whether the images contained third parties;
  - 7.5.3 The considerations as to whether to allow access to those images;
  - 7.5.4 The individuals that were permitted to view the images and when; and
  - 7.5.5 Whether a copy of the images was provided, and if so to whom, when and in what format.

## 8. Disclosure of Images to Third Parties

- 8.0 The club will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 8.1 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
- 8.2 If a request is received from a law enforcement agency for disclosure of CCTV images then the individual with access to the CCTV footage must follow the same process as above in relation to subject access requests. Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
- 8.3 The information above must be recorded in relation to any disclosure.
- 8.4 If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then the Data Protection Officer should be contacted in the first instance and appropriate legal advice may be required.

## 9. Review of Policy and CCTV System

- 9.0 This Policy will be reviewed every two years or earlier should the need arise.

## 10. Misuse of CCTV Systems

- 10.0 The misuse of this CCTV system could constitute a criminal offence.
- 10.1 Any club member who breaches this policy may be subject to disciplinary action by the Management Committee.

## 11. Complaints Relating to this Policy

- 11.0 Any complaints relating to this policy or to the CCTV system operated by MEBC should be made in writing to the Secretary of MEBC.

## 12. Version History

Version	Date	Author	Comments
0.1	23/3/22	M Fraser	Initial Draft
0.2	21/4/22	M Fraser	Updated with informal comments.  Sent to Committee for review.
0.3	9/5/22	M Fraser	Review Comments incorporated.
0.4	13/6/22	M Fraser	Incorporated additional review comments.
1.0	1/8/22	M Fraser	Final comments and upissued for release.