



Wicklow Rowing Club

NORTH PIER WICKLOW HARBOUR

CCTV Policy

07/07/2023

Introduction

The club uses closed circuit television (CCTV) images to protect the club's property and to provide a safe and secure environment for Members and visitors to the Club's premises. This policy sets out the details of how the Club will collect, use and store CCTV images.

The Club's CCTV facility,, will only record images. There is no audio recording i.e. conversations are not recorded on CCTV.

Purposes of CCTV

The Club has carried out a data protection impact assessment and on the basis of its findings it considers it necessary and proportionate to install and use a CCTV system. The data collected from the system will assist in:

- Prevention or detection of crime or equivalent malpractice.
- Identification and prosecution of offenders.
- Monitoring of the security of the Club's premises.
- Ensuring that health and safety rules and Club procedures are being complied with.
- Identification of unauthorised actions or unsafe practices .
- Promoting good club culture .

Location of cameras

Cameras are located at strategic points throughout the Clubs premises, principally at the entrance and exit points. The Club has positioned the cameras so that they only cover communal or public areas and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities or changing rooms.

All cameras are also clearly visible.

Appropriate signs are prominently displayed so that members and visitors are aware they are entering an area covered by CCTV.

Recording and retention of images

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. 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, once the 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 USB keys or which are stored digitally are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 12 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.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the operators of the CCTV system and to those Club officials 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. If media on which images are recorded are removed for viewing purposes, this will be documented.

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 Garda 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 Department of Justice.
- Relevant legal representatives.
- Relevant Club officials

The Club Chairperson (or another senior club official acting in their absence) is the only person who is permitted to authorise disclosure of images 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.

Individuals' access rights

Under the European data protection laws, including the General Data Protection Regulation (GDPR), 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 CCTV images relating to you, you must make a written request to the Club secretary. This can be done by using this email address secretary@wicklowrowingclub.ie. The Club will usually not make a charge for such a request, but we may charge a reasonable fee if you make a request which is manifestly unfounded or excessive, or is repetitive. Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images.

The Club will usually respond promptly and in any case within one month of receiving a request. However, where a request is complex or numerous the Club may extend the one month to respond by a further two months.

The Club will always check the identity of the member making the request before processing it.

The Club Official will always 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 is not Permitted in the club

Training

The Club will ensure that all officials handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the laws regulating data protection and privacy with regard to that system.

Implementation

The Club's Data Protection Officer is responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of the Club's use and processing of CCTV images and ensure that at all times it remains compliant with the laws regulating data protection and privacy. Any complaints or enquiries about the operation of the Company's CCTV system should be addressed to the Chairperson

Data Protection

The Club will process the personal data collected in connection with the operation of the CCTV policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of this data will constitute a data breach and should be reported immediately to the Club's Data Protection Officer