



CCTV & Data Management Policy (under review)

Purpose of Policy

The purpose of this policy is to regulate the use of Closed Circuit Television in the monitoring of the Richmond Canoe Club club premises under the remit of the Committee.

Introduction

Richmond Canoe Club is committed to ensuring as far as possible a safe, secure and friendly environment for members and visitors. We are invested in maximising as much as possible the security of our buildings and facilities.

The person ultimately responsible for data protection is the club cctv officer. This will be reviewed on an annual basis. The system consists of a number of fixed cameras located both internally and externally around the Club premises to cover all buildings. All cameras may be monitored and are only available for use by approved members of staff (and the service provider where relevant).

Objectives of the CCTV System

The objectives of the CCTV system are:

- To deter against damage, vandalism, theft and other offences against the club buildings and contents
- To increase the personal safety of employees, volunteers, members and visitors
- To support external agencies where relevant in reducing and detecting crime
- To assist in identifying, apprehending and prosecuting offenders against the club

Statement of Intent

Richmond Canoe Club will comply with the Data Protection Act 2018, whether it be information, recordings and downloads which relate to the CCTV system. We will register with relevant authorities, including the Information Commissioner's Office (ICO).

Cameras will be used to monitor activities within club premises to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the occupants within the Club, together with its visitors.

Fixed cameras will not focus on areas outside the club premises. The pontoon will be covered.

Materials, recordings or knowledge secured as a result of the CCTV system will not be used for any purpose other than in the event of a safety or security incident.

The CCTV system has been designed to give maximum effectiveness and efficiency, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner will be placed where needed.



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Location of cameras

There are a number of cameras located around the club premises. These cover:

- Entrances and exits from the three boat sheds and club house
- The interior of all three boat houses
- The pontoon
- The repair area in Blade House
- The upper area of the club house, covering the galley and gym

The camera in the repair area also records audio, all other cameras are visual only.

Operation of the System

The system will be administered and managed by the club cctv officer, in accordance with the principles and objectives expressed in this Policy.

The CCTV system will be on 24 hours each day, every day of the year.

The club cctv officer will check and confirm the efficiency of the system periodically to ensure that the equipment is properly recording and that cameras are functional.

Access to CCTV recordings

Access to recordings via the system software on a day to day basis is limited to the club cctv officer and the Club Commodore. Footage (live or recorded) will only be viewed for the following reasons:

1. For security or safety reasons (e.g to ensure the club is locked up)
2. In response to a complaint raised by a member (details below)
3. When requested by the police or other external bodies (details below)

Procedure for members to request use of CCTV footage

If any member is involved in an incident that they feel requires an investigation which could require CCTV footage they should raise a complaint using the club complaints procedure.

- As per the procedure this will be investigated by a sub committee, who will decide if it is appropriate to view the footage.
- If it is deemed relevant then the sub committee will be granted access to the footage by the club cctv officer.
- If it is not deemed relevant then the complaint will be informed that CCTV footage will not be viewed.
- The complaint will then be investigated via the normal protocols.

Video Download Procedures

Recordings may be viewed by and released to the police for the prevention and detection of crime. Permission to do this will be given by the club cctv officer. A record will be maintained of the release of downloads to the police or other authorities. A register will be available for this purpose and will be kept by the club cctv officer. Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police can only be actioned under the Data Protection Act 2018.



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Applications received from other external bodies (e.g. solicitors) to view or release downloads will be referred to the club cctv officer. In these circumstances' downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee can be charged in such circumstances. The club may seek legal advice on all requests.

Storage of images

CCTV images will be stored for one calendar month. Images and recordings are automatically deleted after one calendar month.

Breaches of the Policy (including breaches of security)

Any breach of this Policy by club employees, volunteers or members will be initially investigated by the club cctv officer to take the appropriate disciplinary action in line with the club rules.

Any serious breach of the Policy will be immediately investigated, and an independent investigation carried out.

Complaints about the system

Any complaints about the Club's CCTV system should be addressed to the club cctv officer. Complaints will be investigated within 7 days.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

Requests for Data Subject Access should be made in writing to the club cctv officer. The club will respond within one calendar month.

Public Information

Signs are displayed around the club informing members that CCTV is in operation.

Copies of this Policy will be available on the club website.

System Maintenance and Monitoring

The system will be maintained in accordance with the Data Protection Act 2018.

It will be the responsibility of the club cctv officer to liaise with the service provider for the reporting of faults on the system and any changes to the premises which may affect the operation of the system.

It will be the responsibility of the club cctv officer to arrange regular system reviews with the maintaining company.

Further information and queries should be directed to the club cctv officer

Club CCTV Officer February 2024: cctv@richmondcanoe.club