



Royal Solent Yacht Club CCTV Policy

Introduction

The Royal Solent Yacht Club uses closed circuit television (CCTV) images to provide a safe and secure environment in its Clubhouse and grounds for members, visitors and employees and to protect the Club's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with General Data Protection Regulation (GDPR) and the Information Commissioner's Office (ICO) CCTV Code of Practice.

The Club's CCTV facility records images only. There is no audio recording and therefore conversations are not recorded on CCTV (see the section on covert recording below).

Purposes of CCTV

In line with licensing regulations, the Club has installed CCTV systems for the purposes of:

- assisting in the prevention or detection of crime or equivalent malpractice
- assisting in the identification and prosecution of offenders
- monitoring the security of the Club's premises

Location of cameras

Cameras are located at strategic points throughout the Clubhouse and grounds:

- front entrance/exit door
- car park & workshop entrance
- jetty
- bar areas
- dancing areas
- external smoking areas

The Club has positioned the cameras so that they only cover communal areas and they have been sited so that they provide clear images. No cameras are sited in private areas such as the cloakrooms, shower facilities, changing rooms, staff areas or offices. All cameras are also clearly visible.

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

Recording and retention of images

Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended. 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 are recorded in constant real-time (24 hours a day throughout the year). 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 31 days. Once a 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 CDs are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 31 days. 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 supplier of the CCTV system (Lifeline Alarms & Security Services), the day-to-day operator of the CCTV system (the Club Secretary) and those line managers 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 employees will not have access when viewing is occurring. If media on which images are recorded is removed for viewing purposes, this will be documented. To be able to provide remote support of the system, Lifeline have limited access to CCTV system images via remote access software. These images are strictly controlled under their data protection policy. Images may be provided to their support partners such as their Alarm Receiving Centre to provide monitoring support services and manufacturers or their representatives to carry out diagnostic or corrective activity. These images will not be passed on to any other party without the express consent of the Club Secretary.

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
- prosecution agencies, such as the Crown Prosecution Service
- relevant legal representatives
- line managers and directors involved with Club disciplinary processes
- individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Club Secretary or another authorised person acting in their absence are the only persons who are permitted to authorise disclosure of information 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 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 of your CCTV images, you must make a written request to the Club Secretary. 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 Club Secretary 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.

Staff training

The Club will ensure that any employees authorised to handle CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the GDPR with regard to that system.

Implementation

The Club Secretary is 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.

More information

You can find out more information about the Royal Solent Yacht Club's Privacy Policy by the following methods:

Tel: 01983 760256

Web: <https://www.royalsolent.org/privacy-policy/>
Email: secretary@royalsolent.org

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Royal Solent Yacht Club



Signed:

Claire Hallett
Club Secretary