

**Updated March 2021**

## **CCTV POLICY AND PRINCIPLES OF OPERATION**

### **1 Introduction**

Baslow Sports Field Charitable Incorporated Organisation (“BSFCIO”) is fully committed to the safety of its club members and visitors and to this extent has invested in the security of its buildings and facilities. The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at the Baslow Sports Field.

Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the General Data Protection Regulations (GDPR) 2018. The person ultimately accountable for data protection within the Trust is the Chairman.

The system comprises a number of fixed and dome cameras located both internally and externally around the Pavilion and Sports Field environs. All cameras may be monitored and are only available for use specifically for Trust purposes.

The CCTV system is owned by BSFCIO and will be subject to review on an annual basis.

### **2 Objectives of the CCTV System**

The objectives of the CCTV system are to

- a) Protect the Sports Pavilion and surrounding areas and its assets to ensure they are kept free from intrusion, vandalism, damage, abuse or disruption.
- b) Support the police in a bid to deter and detect crime.
- c) Assist in identifying, apprehending and prosecuting offenders on the Trust site.
- d) Protect members of the public and private property.

### **3 Policy Statement**

The CCTV system will be registered with the Information Commissioner under the terms of GDPR and will seek to comply with the requirements both of GDPR and the Commissioner's Code of Practice when managing the CCTV System and its recordings and playbacks.

Cameras will be used

- a) to monitor activities within the Cavendish Pavilion and surrounding areas to identify criminal activity actually occurring, anticipated, or perceived.
- b) for the purpose of securing the safety and well-being of club members together with their visitors.
- c) for the purpose of securing the property of BSFCIO and identifying abuse of the facilities

The cameras will not focus on private homes, gardens and other areas of private property

Materials or knowledge secured as a result of CCTV system will not be used for any commercial purpose. Copies and Downloads will only be released to the media for use in the investigation of a specific crime and with the written authority of the police.

Copies and Downloads will never be released to the media for purposes of entertainment.

The planning and design of the existing CCTV system has endeavored to ensure that the CCTV system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the CCTV 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 must be placed at all appropriate points within areas covered by the CCTV system cameras.

#### **4 Principles of Operation**

The system will be administered and managed by a nominated Trustee, or a secondary nominated Trustee, in accordance with the principles and objectives expressed in this Policy.

The day-to-day management will be the responsibility of the nominated Trustee.

The CCTV system will be operated 24 hours each day, every day of the year. No active monitoring of the cameras will take place unless authorised by the Chairman or nominated Trustees in support of incident investigations and/or requests from the police.

#### **5 CCTV System**

The nominated Trustee will check and confirm the efficiency of the system on a monthly basis and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV System will only be permitted to assist in the identification of criminal activity or abuse of the Pavilion facilities. Access will be restricted to the Chairman, nominated Trustees and nominated keyholders.

The CCTV system may generate a certain amount of concern from members of the public. The signage must provide contact details members of the public can use to relay any comments on the system. All comments will be referred to the nominated Trustee and, if appropriate, the Chairman.

The system is designed to be fully automated, requiring a monthly check of operation only. Images will be stored on the local hard drive of the system and when the disk is full, images from previous periods will automatically be overwritten. Image retention will be approximately two weeks after which they will be overwritten and erased permanently.

No images, or copies of images, will be held remote from the system, unless copies are authorised by the Chairman in support of legal or police investigations.

The system including processor, recorder, disk and monitor will be housed in a locked room. Access to the system will be password protected. Keys to the room and passwords will be strictly allocated to nominated trustees and authorised key holders.

## **6 Liaison**

Liaison meetings may be held with all bodies involved in the support of the CCTV system i.e., maintenance contractors, nominated trustees, police etc.

Recordings may be viewed by the police and nominated Trustees for the prevention and detection of crime. Permission to do this will be given from the Chairman.

A record will be maintained of the release of image downloads or copies to the police or other authorised applicants. A register will be available for this purpose and will be kept by the nominated Trustee.

Viewing of downloads by the police must be recorded in writing and maintained in the register.

Requests by the police can only be actioned under GDPR.

Should a download or copy be required as evidence, it may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads or copies will only be released to the police on the clear understanding that the disc, and any copies, remain the property of BSFCIO and both the disc and information contained on it are to be treated in accordance with this Policy.

BSFCIO also retains the right to refuse permission for the police to pass to any other person the disc or any part of the information contained thereon.

Applications received from outside bodies (e.g. solicitors) to view or release downloads or copies will be referred to the Chairman. In these circumstances downloads or copies will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings.

A fee of £100 can be charged for a subject access request, or in response to a Court Order.

## **7 Breaches of the Policy (including breaches of security)**

The Chairman, in order for him to take the appropriate action, will initially investigate any breach of this Policy. The Chairman may authorise independent investigations for any serious breaches arising.

## **8 Assessment of the Scheme and CCTV Usage Policy**

The nominated Trustees, or any person approved by the Chairman, may carry out performance monitoring, including random operating checks.

## **9 Complaints**

Any complaints about BSFCIO's CCTV system should be addressed to the Chairman. Complaints will be investigated in accordance with Section 6 of this Policy

## **10 Access by the Data Subject**

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

Requests for Data Subject Access should be made in writing to the Chairman.

## **11 Public Information**

Copies of this Policy will be available to the public on the BSFCIO's public website or by making a request to the Chairman.

## **12 System Maintenance and Monitoring**

The system will be maintained in accordance with the GDPR.

The system will only be maintained and monitored by companies that carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).

It will be the responsibility of nominated Trustee to liaise with the maintaining company for the reporting of faults on the system, any changes to the site that may affect the operation of the system.

It will be the responsibility of the nominated Trustee to arrange regular system reviews with the maintaining company.

### **13 Summary of Key Points**

This CCTV Usage Policy will be reviewed on an annual basis. The CCTV system is owned and operated by BSFCIO. The CCTV system will not be a manned operation. The nominated Trustee, following approval from the Chairman, will only monitor internal and external cameras reactively.

Club Members/Visitors/ members of the public cannot access the CCTV system except by prior arrangement with the Chairman and with good reason.

Liaison meetings may be held with the police and other bodies.

Nominated Trustees and/or the police may only view images.

Copies of images required, as evidence will be properly recorded, witnessed and packaged before copies are released to the police.

Copies will not be made available to the media for commercial or entertainment reasons.

Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Usage Policy.

The Chairman will investigate any breaches of this Policy.

An independent investigation will be carried out for serious breaches. Breaches of the Policy and any proposed recommendations will be reported to the Chairman. An approved contractor will maintain the system on a regular basis.

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