



# CCTV Policy

## NOTTINGHAM CROQUET CLUB - CCTV POLICY

### Introduction

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Nottingham Croquet Club. The system comprises of a number of fixed cameras located on the East pavilion and on the West pavilion. All cameras are linked to the wired network and the system can only be accessed by the nominated Security Officer, or those authorised by him. The Club owns the CCTV system. The Policy will be subject to review by the Club's Committee. This Policy follows the Data Protection Act guidelines.

### Objectives of the CCTV Policy

The objectives of the Club's use of CCTV are:

- a) To help protect the club buildings, equipment and members' property stored at the club
- b) To support the Police in a bid to deter and detect crime
- c) To assist in identifying, apprehending and potentially prosecuting offenders
- d) To provide information to members on weather, lawn condition and occupancy by displaying periodically refreshed snapshots of the East and West lawns on the club website.

### Statement of intent

The CCTV Scheme has been registered with the Information Commissioner under the terms of the Data Protection Act 2018 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. The Club will treat the system and all information, documents and recordings obtained and used as data protected by the Act.

Cameras will be used to monitor activities within the Club grounds in the vicinity of the pavilions and the lawns, to identify adverse activity actually occurring, anticipated or perceived. Static cameras are positioned to ensure they do not focus on the public areas of Highfields Park, the access to the Park, or the adjacent road or footpath/cycle track. At no time will a camera be directed to follow or track an individual as all the currently deployed cameras are fixed.

Materials or knowledge secured as a result of CCTV use will not be used for any commercial purpose. Images will only be released for use in the investigation of a specific crime and with the written authority of the police. Images will never be released to the media for purposes of entertainment.

The planning and design has endeavoured to ensure that the CCTV Scheme will give maximum effectiveness and efficiency within available means, 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, have been placed at all access routes to areas covered by the Club's CCTV System.

### **Operation of the system**

The CCTV system will be administered and managed by the Club in accordance with the values and objectives expressed in the code. The day to day management will be the delegated responsibility of the Security Officer who will be appointed by the club's committee. The CCTV system will operate 24 hours each day, every day of the year, recording all activity.

### **Control and Liaison**

The security officer is able to check and confirm the efficiency of the system and, in particular, that the equipment is properly recording and that cameras are functional, on a daily basis. The Club will undertake the regular servicing and/or repairs and maintenance of the system.

All access to recorded footage and offsite monitoring is password protected.

### **Monitoring procedures**

Up to 14 days can be held on the camera(s) SD cards. In normal circumstances footage will be kept for up to 30 days. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

### **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.

The club will log any footage, noting the date and time, required to be viewed after an incident or suspected incident and any footage released to the Police or other authorised applicants. A register will be maintained for this purpose.

Viewing of footage by the Police or any external individual must be recorded in writing and entered in the register. Requests by the Police can only be authorised under part 3 of the Data Protection Act 2018. Should images be required as evidence, footage may be released to the Police under the procedures described in this paragraph of this Code.

Images will only be released to the Police on the clear understanding that the footage remains the property of the Club, and images are to be treated in accordance with this code. The Club also retains the right to refuse permission for the Police to pass the footage to any other person.

The Police may require the Club to retain any Images for possible use as evidence in the future. Such Images will be properly indexed and securely stored on the security officer's hard drive, which is data protected, until the Police need them.

Applications received from outside bodies (e.g. solicitors) to view or release footage stored will be referred to the Hon. Secretary. In these circumstances images will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, or in response to a Court Order. A fee may be charged in such circumstances.

If footage is required for future purposes it will be identified, isolated and stored on the security officer's hard drive. Such evidence will be dated, the time identified and the information logged in the register which will be kept in a secure place offsite. The log will be signed by the security officer. Images may be viewed by the Police for the prevention and detection of crime.

### **Breaches of the code (including breaches of security)**

The Hon. Secretary will initially investigate any breach of the Code of Practice by the Security Officer or any other Club member.

### **Complaints**

Any complaints about the Club's CCTV system should be addressed to the Hon. Secretary.

Complaints will be dealt with in accordance with the ICO Code of Practice. (\*Please see the link at the bottom of the policy).

### **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 them, including those obtained by CCTV. Requests for Data Subject Access should be made through the Hon. Secretary. The Club reserves the right to make a charge of up to £10 (currently the statutory amount as permitted by Parliament).

### **Public information**

Copies of this policy will be available to the public from the Club website or from the Hon. Secretary.

Issued by: Nottingham Croquet Club Committee – 22<sup>nd</sup> January 2021

ICO Code of Practice link:

<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>