



# RSC CCTV Policy

April 2021



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Rickmansworth Sailing Club uses closed circuit television camera to monitor our premises and site. This policy sets out how we do that and how we manage the system.

If you have any queries about the system, please contact [dataprotection@rscsailing.org](mailto:dataprotection@rscsailing.org)

Rickmansworth Sailing Club uses closed circuit television (CCTV) images to provide a safe and secure environment for members and visitors to the Club's premises as well as to protect the Club's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act and the Information Commissioner's Office CCTV Code of Practice.

The Club's CCTV facility records images.

## PURPOSES OF CCTV

The purposes of the Club installing and using CCTV systems include to:

- ▶ assist in the prevention or detection of crime or equivalent malpractice
- ▶ assist in the identification and prosecution of offenders
- ▶ monitor the security of the Club's premises

## LOCATION OF CAMERAS

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

Appropriate signs are prominently and clearly displayed so that members and other visitors 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 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, are not held for more than 200 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 one month. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

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## 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 Flag Officers 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 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
- ▶ individuals whose images have been recorded and retained and make a valid SAR

The Commodore and Data Protection Manager of the Rickmansworth Sailing Club are the only people 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. A formal request in writing must be made on the form provided by the Rickmansworth Sailing Club.

## INDIVIDUALS' ACCESS RIGHTS

Under the Data Protection Act, 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 Data Protection Manager via [dataprotection@rscsailing.org](mailto:dataprotection@rscsailing.org). 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.

## ACCESS FEE

We may charge a 'reasonable fee' for the administrative costs of complying with a request if it is manifestly unfounded or excessive, or if an individual requests further copies of their data.

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## COVERT RECORDING

The Club will only undertake covert recording with the written authorisation of the Commodore (or another senior person acting in their absence) where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring may include both video and audio recording.

Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.

Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected during covert monitoring will be deleted or destroyed unless it reveals information which the Club cannot reasonably be expected to ignore.

## FLAG OFFICER TRAINING

The Club will ensure that all employees handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the Data Protection Act, regarding that system.

## IMPLEMENTATION

The Commodore and Data Protection Manager of Rickmansworth Sailing Club are responsible for the implementation of and compliance with this policy. The operation of the CCTV system is delegated to an Operations Manager who 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 the Operations Manager.

## REVIEW SCHEDULE

This policy will be reviewed annually

*For more details, please address any questions, comments  
and requests regarding our data processing practices to our*

*Data Protection Manager:*

Martin Smethers

10 Hazel Close, Alderholt, Dorset SP6 3DQ

or email [dataprotection@rscsailing.org](mailto:dataprotection@rscsailing.org)

*Operations Manager*

David Hurst

[davidhurst01753@gmail.com](mailto:davidhurst01753@gmail.com)

# Certificate

Organisation Name:

**Rickmansworth Sailing Club**

Reference number:

**ZB025459**

Tier:

**Tier 1**

Start date:

**24 March 2021**

End date:

**23 March 2022**

## Data Protection Officer

**Title:** Mr  
**Name:** Martin Smethers  
**Address:** 10 Hazel Close  
Alderholt  
Fordingbridge  
Dorset  
SP6 3DQ

**Email address:** martinsmethers@rscsailing.org

**Telephone number:** 07860352279

**Publish Name:** No

**Publish Contact Details:** Yes