

LOWLANDS CLOSED CIRCUIT TELEVISION (CCTV) POLICY

Introduction:

Lowlands Club uses closed circuit television (CCTV) images to protect the Club's property and to provide a safe and secure environment for employees and visitors to the Club premises. This policy sets out the details of how the Club will collect, use and store CCTV images.

For more information on your privacy rights associated with the processing of your personal data collected through CCTV images please refer to the Club's privacy notice and data protection policy.

The Club's CCTV facility will only record images. There is no audio recording i.e. conversations are not recorded on CCTV.

Purposes of CCTV:

The Club has carried out a data protection impact assessment and on the basis of its findings it considers it necessary and proportionate to use a CCTV system. The data collected from the system will assist in:

- Prevention or detection of crime or equivalent malpractice.
- Identification and prosecution of offenders.
- Monitoring of the security of the Club's business premises.

Location of Cameras:

Cameras are located at strategic points throughout the Club's premises. The Club has positioned the cameras so that they only cover communal or public areas on the Club's premises and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities, or changing rooms.

All cameras are clearly visible.

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

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 business dictate.

As the recording system records digital images, any CCTV images that are held on the hard drive are deleted and overwritten on a recycling basis and, in any event, once the 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 or which are stored digitally are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 12 months, 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 authorised personnel identified by Lowlands Management Committee.

Viewing of recorded images will take place in a restricted area to which other individuals 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 (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

Authority to disclose images to external third parties such as law enforcement agencies will be made by Lowlands Management Committee.

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 the UK's data protection laws, including the General Data Protection Regulation (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 CCTV images relating to you, you must make a written request to Lowlands Management Committee. This can be done by using this email address: info@lowlandsclub.com.

The Club will usually not make a charge for such a request, but we may charge a reasonable fee if you make a request which is manifestly unfounded or excessive, or is repetitive.

Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images.

The Club will usually respond promptly and in any case within one month of receiving a request. However, where a request is complex or numerous the Club may extend the one month to respond by a further two months.

The Club will always check the identity of the employee making the request before processing it.

The Management Committee will always 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 Company 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.

Covert Recording:

The Club is aware that covert recording can only be done in exceptional circumstances for example where the Club suspects criminal activity taking place.

On this basis the Club will only undertake covert monitoring if it has carried out a data protection impact assessment which has addressed the following:

- the purpose of the covert recording;
- the necessity and proportionality of the covert recording;
- the risks to the privacy rights of the individual(s) affected by the covert recording;
- the time parameters for conducting the covert recording
- the safeguards and/or security measures that need to be put in place to ensure the covert recording is conducted in accordance with the data protection laws, including GDPR.

If after undertaking the data impact assessment the Club considers there is a proportionate risk of criminal activity, or equivalent malpractice taking place or about to take place, and if informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection, the Club will covertly record the suspected individual(s).

In doing this the Club will rely on the protection of its own legitimate interests as the lawful and justifiable legal basis for carrying out the covert recording.

Before the covert recording commences the Management Committee will agree with the findings of the data protection assessment and provide written authorisation to proceed with the covert recording.

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 a particular 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 in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Club cannot reasonably be expected to ignore.

Staff Training:

The Club will ensure that all individuals handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the laws regulating data protection and privacy about that system.

Implementation:

Lowlands Management Committee are responsible for the implementation of, and compliance with this policy and the operation of the CCTV system.

They will conduct regular reviews of the Club's use and processing of CCTV images and ensure that, at all times, it remains compliant with the laws regulating data protection and privacy. Any complaints or enquiries about the operation of the Clubs CCTV system should be addressed to Lowlands Management Committee at info@lowlandsclub.com.

Data Protection:

The Club will process the personal data collected in connection with the operation of the CCTV policy in accordance with its data protection policy and any internal privacy notices in force at the relevant time.

If you believe there may have been inappropriate access or disclosure of this data, this may constitute a data breach and should be reported immediately to the Management Committee or in more serious circumstances, the Information Commissioner's Office at the following address:

Wycliffe House

Water Lane

Wilmslow

Cheshire

SK9 5AF

Helpline number: 0303 123 1113

ICO website: <https://www.ico.org.uk>

Reported data breaches will be taken seriously by the Club and investigated.