

CMYC CCTV Policy

1 Introduction

- a) The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Crawley Mariners Yacht Club.
- b) The system comprises of a number of fixed cameras located on the club house. All cameras are linked to a central recording system that is sited in a secure position within the clubhouse. The system does not make audio recordings.
- c) CCTV Footage is only reviewed by nominated members of the sailing club when an incident has occurred and a request to review the footage has been made and approved by the Commodore or a Flag Officer.
- d) The Club owns the CCTV system.
- e) This Policy will be subject to review by the Main Committee *every three years* which will include a review in respect of the effectiveness and necessity of the system. This policy and CCTV system is operated within the Information Commissioner's Code of Practice for CCTV September 2017.
- f) CMYC is an organisation that processes personal data and is subject to the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Under the Data Protection (Charges and Information) Regulations 2018 (the Regulations) it must also pay an annual data protection fee which it does so under the ref: ICO:00014404829.

2 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 deter crime.
- c) To assist in identifying and potentially prosecuting offenders

3 Statement of intent

This 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 record activities within the Club grounds. Static cameras are positioned to ensure they do not focus on private homes, gardens and other areas of private property.

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 or associated with a subject access request. Images will never be released to the media for purposes of entertainment.

The planning and design of our system 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.

4 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 nominated persons. The CCTV system will operate 24 hours each day, every day of the year, recording all activity.

The nominated persons will check, no more than once per day, that the system is operating effectively and in particular that the equipment is properly recording and that cameras are functional and the system date and time is correct.

Defects will be reported to the committee at the earliest opportunity. If a supplier is required to do maintenance of the system they will be escorted by a nominated person.

5 Control of Software and access to the system

- a) The CCTV is stored in a locked room within the Clubhouse.
- b) Access to the CCTV software will be strictly limited to nominated persons with a password.
- c) Access to the system will be required for controlling and maintaining downloaded digital materials, performing maintenance and system access logs. All Access will be recorded in the logbook.

6 Monitoring procedures

Camera surveillance may be maintained at all times and footage continuously recorded for up to 30 days in the system memory before being overwritten. In the event of an incident, a nominated person will review recorded images from a secure area\home office where no other person can review the recorded image.

In the event of the Commodore or Flag Officer being notified of an incident one of the nominated CCTV reviewers will review the footage and advise on whether images of the incident are available.

If necessary images\footage will be copied to a USB flash drive and passed to Surrey Police by the Commodore who is the Club's principal contact with the local PCSO.

The following procedures will cover the use and retention of flash drives:

- a) Each USB flash drive must be identified by a unique reference number.
- b) Images must be copied into a unique USB flash drive.
- c) The Nominated person responsible for recording will register the date and time of the recording, including the USB flash drive reference number in a register book kept with the system.
- d) Faulty USB sticks containing images\footage will be destroyed by incinerating or crushing.
- e) Lost or stolen USB sticks will be reported to the committee
- f) If it is decided to report the incident to the police and they require CCTV images to carry out further investigation, the relevant Images\recording will be copied to a new unique USB flash drive. Note: Surrey Police will provide a CCTV pack for this purpose. Currently they require two copies of the images, one marked Master Copy and the other Working copy, and these copies should be sealed in separate envelopes provided by the police, and signed by a nominated person across the seal.
- g) New USB flash drives are currently the best way to send copies to the police.

h) Requests by the Police can only be authorised under section 29 of the Data Protection Act 2018. Should images be required as evidence, copies may be released to the Police under the procedures described in this paragraph of this code.

i) Viewing of footage by the Police or any external individual must be recorded in writing and entered in the register.

j) Images/footage copied to USB sticks that are not used as part of an investigation or other valid request will be deleted after 30 days

The Club also retains the right to refuse permission for the Police to pass to any other person the USB Flash drive or any part of the images contained thereon.

The Police may require the Club to retain any stored Images for possible use as evidence in the future. Such Images will be properly indexed and securely stored until the Police need them. Applications received from outside bodies (e.g. solicitors) to view or release footage stored on USB Flash drive will be referred to the Hon. Secretary. In these circumstances, copies of the USB Flash drive with 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.

7 Breaches of the code (including breaches of security) and compliance

The Commodore will initially investigate any breach of the Code by the nominated persons or any other Club member and will undertake systematic checks to ensure that the Club is complying with the 30 day retention period and that the Logbook is kept up to date.

8 Complaints

Any complaints about the Club's CCTV system should be addressed to the Commodore. Complaints will be dealt with in accordance with the ICO Code of Practice.

9 Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) with a right to see 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).

10 Public information

Copies of this policy will be available to the public from the Club website or from the Commodore or other main committee member.

As at August 2020 nominated persons are: Adrian Fisher; Allan Pemberton and Paul Hetherington. Nominated persons have signed a declaration that they are familiar with the Club's CCTV Policy and Procedures and that they will abide by its terms and conditions.

Note: We are currently using three nominated persons to ensure that there is always someone available, to view and download images if necessary, before they are over-written, in times of holiday etc.

Webcam Operation

CMYC operates a webcam which is intended to transmit images of the weather conditions prevailing at Hedgecourt Lake to help inform Club members' decisions to participate in activities at the lake.

Signs advising members that a webcam is operating are positioned in and around the Clubhouse.

CMYC's webcam streaming image is solely for information, and should not be used for any surveillance or any lawful or unlawful purpose other than what is stated above. Our webcam stream does not infringe any individual rights or personal integrity due to the positioning of the webcam at a height and angle that prevent any viewer from identifying an individual with complete certainty. All image streaming is stored in a data cache memory for a short period of time (minutes), and beyond that time limit no imaging can be made available and is automatically erased. All images and streaming on this website is copyrighted and should not be copied, without official authorisation from CMYC.