



# Nottinghamshire County Sailing Club

## CCTV Policy

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Version: 003  
Dated: 28<sup>th</sup> July 2024

### Introduction

The purpose of this policy is to regulate the management, operation and use of the closed circuit television (CCTV) system owned by and located at Nottinghamshire County Sailing Club (NCSC). The system comprises of a number of fixed cameras located on and in the club buildings, and on club land. All cameras are controlled from a secure location within the clubhouse and the system can only be accessed by a nominated Security Officer and persons as determined by the NCSC Executive Committee. The policy will be subject to review and acceptance by the Executive Committee. This policy follows the Data Protection Act guidelines. There is also a live webcam viewable by anyone on the club website.

### Objectives of the CCTV Policy

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

- a) To protect the club's buildings and equipment
- b) To protect members' property stored at the club
- c) To support the Police recommendations to support their ambition to deter and detect crime
- d) To assist in identifying, apprehending and potentially prosecuting offenders

### Statement of intent

The CCTV Scheme has been registered with the Information Commissioner under the terms of the Data Protection Act 1998 and seeks to comply with the requirements of both 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's grounds and in the vicinity of the access gates to identify adverse activity actually occurring, anticipated or perceived.

Static cameras are positioned to ensure they do not focus on private homes, gardens and other areas of private property. At no time will a camera be directed to follow or track an individual. The webcam on the clubhouse scans the dinghy park and lake. Material information, or knowledge secured as a result of CCTV use, will not be used for any commercial purposes. Images will only be released to non-NCSC persons for use in the investigation of a specific crime and with the written authority of the Police. Recorded images will never be released to the media, including social media platforms, for the purposes of entertainment (with the exception of the webcam on the website).

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 NCSC in accordance with the values and objectives expressed in the Code of Practice. Management of the system will be the nominated responsibility of the Security Officer. The CCTV system is intended to operate 24 hours each day, every day of the year, recording all activity.

### Control and Liaison

The Security Officer will ensure that the system provider periodically, at intervals no longer than annually, checks and confirms the efficiency of the system and, in particular, that the equipment is properly recording and that cameras are

functional. The security officer will liaise with the supplier regarding servicing and/or repairs and maintenance of the system.

### **Access to The System**

Access to the system will be limited to:

- NCSC Flag Officers (Commodore, Vice Commodore and Rear Commodore)
- NCSC Security Officer
- NCSC Bosun
- The Equipment Supplier/Maintainer

### **Monitoring procedures**

Camera surveillance is intended to be maintained at all times and footage continuously recorded. Up to 40 days of footage is held on the system memory. To maintain and preserve the integrity of any storage medium used to store data from the system's hard drive and to facilitate any use of data in any future proceedings, the following procedures for their use and retention will be strictly adhered to:

- a) The initial download may be to a remote device, recordings will then be transferred to a storage device. Local copies will not be retained.
- b) Each data storage device must be identified by a unique reference number.
- c) Before using, each data storage device must be cleared of any previous recording.
- d) The person responsible for recording will register the date and time of the recording, including the data storage device reference number (reference a) above).
- e) Each data storage device required for evidential purposes must be placed in a sealed envelope, suitably identified, dated and signed by the Security Officer and witnessed by a NCSC Member, and then stored in the NCSC safe.
- f) Images may be viewed by the Police for the prevention and detection of crime. A record will be maintained of any data storage device released to the Police or other authorised applicants. A register will be maintained by the Security Officer 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 Section 29 of the Data Protection Act 1998. Should images be required as evidence, a copy may be released to the Police.

Images will only be released to the Police on the clear understanding that the data storage device remains the property of NCSC, and both it and images on it are to be treated in accordance with this policy. NCSC also retains the right to refuse permission for the Police to pass to any other person the data storage device or any part of the images contained thereon.

The Police may require the Club to retain any data storage device or Images for possible use as evidence in the future. Such data storage device or images will be properly indexed and securely stored and notified in the register until the Police need them.

Applications received by NCSC from outside bodies (e.g. solicitors) to view or release footage stored on any data storage device will be referred to the Security Officer and Commodore. In these circumstances the data storage device 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 to cover the cost of replacing the data storage device may be charged in such circumstances.

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

Any suspected breaches of this code will be investigated by the Security Officer and a flag officer with full disclosure of all proceedings to the flag officers

### **Complaints**

Any complaints about the Club's CCTV system policy, operation or related items should be addressed to the Commodore.

Complaints will be dealt with in accordance with the ICO Code of Practice.

**Access to data by the Data Subject**

The Data Protection Act provides Data Subjects, individuals to whom "personal data" relates, with a right to data held about them, including those obtained by CCTV. Requests for Data Subject Access should be made through the Commodore or Honorary Secretary. The Club reserves the right to make a charge of up to £10 (currently the statutory amount as permitted by Parliament) for such access.