



CCTV Policy and Procedure

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1. Introduction

This policy aims to ensure that the CCTV systems installed and operated by DGC comply with the law and that the scope, purpose and use of the systems are clearly defined.

2. Definitions

For the purpose of the policy the following definitions will apply:

- DGC refers to the organisation known as Darlington Gymnastics Club
- CCTV is the closed circuit television system
- The Data Controller is the Club Chair Person (or any person defined by the Directors in minutes)
- Chair refers to DGC Chair Person
- HR refers to the person responsible for HR at DGC (Usually the Administration Manager)

3. Scope

This policy is binding on all employees of DGC and all employees of any contracted-out services. It also applies to all other persons who maybe present, for whatever reason, on DGC property.

4. Ownership and operation

The CCTV system and all recorded material and copyright are owned by DGC.

5. Principles

The following principles will govern the operation of the CCTV system:

- The CCTV system will be operated fairly and lawfully and only for the purposes set out in this policy
- The CCTV system will be operated with due regard for privacy of all individuals.
- Any changes to the purposes for which the CCTV system is operated will require prior approval of the Chair

6. Purpose of the CCTV system

The system is intended to provide an increased level of security in the workplace for the benefit of those who work in or visit DGC premises. The CCTV system will be used to respond to the following key objectives which will be subject to an annual assessment:

- To detect, prevent or reduce the incidence of crime
- To prevent and respond effectively to all forms of harassment and disorder.
- To reduce the fear of crime

- To create a safer environment
- To gather evidence by a fair and accountable method
- To provide emergency services assistance
- To assist with health and safety and other serious occurrences
- To detect, prevent and reduce the incidence of any internal conduct and performance matters which can lead to DGC's disciplinary procedure being initiated

As confidence in the system is essential, all cameras will be operational. An appropriate maintenance programme will be established.

7. System details

The CCTV systems comprise of both visible and covert cameras situated in various locations around the estate, which continuously recorded activities in these areas. The images are stored in digital video recorders which are kept in the staff room, accessible only by authorised staff.

8. Installation and signage

Cameras shall not be hidden from view and signs will be prominently displayed at the entrance to the building. The signs will indicate:

- The presence of monitoring and recording
- The ownership of the system
- Contact telephone number

9. Covert recording

Covert cameras may be used within pre-defined CCTV areas under the following circumstances on the written authorisation of the Chair and where it has been assessed by the Data Controller:

- That informing the individual(s) concerned that recording was taking place would seriously prejudice the objective of making the recording; and
- That there is reasonable cause to suspect that unauthorised or illegal activity is taking place or is about to take place.

Any such covert processing will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected unauthorised activity.

The decision to adopt covert recording will be fully documented and will set out how the decision to use covert recording was reached and by whom.

10. Data Protection Act

Where images of living, identifiable individuals are deliberately recorded, this is likely to include those individual's personal data. The collection, use and storage of personal data are governed by the Data Protection Act. DGC is registered with the Commissioner as a data controller operating CCTV.

Given that any particular sequence of CCTV recording may include personal data; all such recordings will be treated in accordance with the data protection principles. The principles are set out in full in the appendix.

Data subject's rights, including a right of access to their personal data will be respected where recordings are confirmed to comprise personal data. Where an individual requests access to recordings believed to be their personal data, the matter shall be referred to the individual responsible for HR

11. Access to live footage and recordings

11.1. Access to live footage.

Images captured by the system will be monitored on the premises. For operational purposes, and in accordance with the stated purposes of the system, only designated staff, trained in their duties, shall have access to live footage. A list of these staff is updated as appropriate and is held by the Data Controller. Non-essential access to the CCTV systems will be controlled by means of keypad access lock, with access levels controlled and monitored by the Data Controller.

Access codes will be changed regularly, and in any case if they are shared with another staff member for the purposes of an investigation into a serious occurrence, once this access is no longer required for this purpose. The codes will be stored securely, with a hard copy of the master code kept in the safe and updated each time the code is changed.

11.2. Access to recordings.

For operational purposes and in accordance with the stated purposes of the system, only designated staff shall have primary access to CCTV recordings. The Data Controller or nominee may permit the viewing of CCTV recorded materials by Police and other staff where this is necessary in connection with a serious occurrence. The Data Controller or nominee will have authority for making a decision regarding who should have access to this data other than designated staff and ensuring that data is used in accordance with the Data Protection Act.

11.3. Downloading of recorded material

Pre-recorded CCTV data should not be downloaded due to potential infringement of the Data Protection Act. Data should only be downloaded or saved if it forms part of an investigation into a serious occurrence including a staff conduct or performance matter. Requests for data should only come from the Individual responsible for HR, the club Chairperson or Secretary or the Police.

Once a request to save information is received the Data Controller, (or in his absence the Lead Coach in Gym with support from Committee), then collates the required data, any data saved to disc is placed in a sealed evidence bag along with a digital evidence log sheet. This log is signed by the person downloading the data and also by the Investigating Officer requesting the information.

11. Access by Data Subjects

CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act. Anyone who believes that they have been filmed by CCTV is entitled to ask for a copy of the data, subject to exemptions contained in the Act.

Data Subjects may make a Subject Access Request for CCTV images / recordings / information (request for data about themselves) by applying in writing to HR and must provide the following information:

- dates and times of the incident or their visit to DGC with details of the specific location on DGC premises;
- two photographs –one full face and one side view;
- proof of identity (e.g driving licence/passport containing a photograph);
- cheque or cash in the sum of £10.00.

A response will be provided promptly and in any event within 40 calendar days of receiving the required fee and information.

DGC has the right to refuse a request for a copy of the data particularly where such access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders. If it is decided that a data subject access request is to be refused, the reasons will be fully documented and the data subject informed in writing, stating the reasons.

12. Retention and disposal of recorded materials

CCTV recordings and other materials produced from them shall be retained for one calendar month unless an incident is recorded which requires further investigation. In the latter case, recordings shall be kept for a period of three years from the date of recording.

All media no longer required, on which recordings were made will be returned to the Data Controller to be shredded and the appropriate details entered in the destruction records.

13. Breaches of the code and complaints

A copy of this policy will be made available to anyone requesting it. Breaches of this policy should be reported immediately to the Data Controller or the HR Department.

Any complaint concerning misuse of the system will be treated seriously and fully investigated. Breaches of this policy shall be dealt with in accordance with the appropriate disciplinary policy. Serious breaches of this policy may result in criminal liability on behalf of the individual which may also be considered as gross misconduct.

Appendix 1

Data Protection Principles:

“Processing” shall be taken to mean all operations including obtaining, recording, storing, analysing or converting into other formats.

1. Personal data shall be processed fairly and lawfully
2. Personal data shall be obtained only for one or more specified and lawful purposes and shall not be processed in a manner incompatible with those purposes
3. Personal data shall be adequate, relevant and not excessive in relation to the purpose for which the data is held
4. Personal data shall be accurate and, where necessary, kept up to date
5. Personal data shall not be held longer than is necessary in relation to the stated purposes
6. Personal data will be processed in accordance with the rights of data subjects under the Data Protection Act 1998
7. The data controller shall take appropriate security measures to prevent unauthorised or accidental access to, alteration, disclosure or loss and destruction of personal data.
8. Personal data will not be transferred outside the European Economic Area without ensuring an adequate level of protection in relation to the processing of personal data

Appendix 2:

Contact Details:

HR Department: Admin@darlingtongymnastics.co.uk

Data Controller / Chair Person: Manager@darlingtongymnastics.co.uk