



Goring Thames Sailing Club CCTV Policy v2.0

Introduction

The purpose of this Policy is to regulate the management, operation and use of the Closed-Circuit Television (CCTV) system at Goring Thames Sailing Club (GTSC). The system comprises of a number of cameras located within the GTSC grounds and buildings with secure Google Nest infrastructure to control those cameras and manage the recordings.

This Policy will be subject to periodic review by the GTSC Committee to ensure it meets the needs of GTSC and complies with relevant legislation.

This policy follows the principles outlined in the Data Protection Act 2018.

We have identified the potential impact on individuals' privacy and taken this into account when installing and operating the CCTV system

Registration

GTSC has paid the data protection fee to the Information Commissioner's Office (ICO) and is duly registered.

Governance

The objectives of GTSC's use of CCTV are:

- a) To help protect the GTSC buildings, equipment and members' property stored at GTSC.
- b) To support the Police in a bid to deter and detect crime.
- c) To assist in identifying, apprehending and potentially prosecuting offenders.

This policy governs the use of the system and recordings and nominated individuals who are responsible for the operation and maintenance of the system. The day-to-day management and maintenance of the CCTV System will be the delegated responsibility of a nominated member of the GTSC Committee.

Requests for Data

GTSC 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 GTSC grounds to identify adverse activity actually occurring, anticipated or perceived. Live images from cameras offering general views of the grounds and car park may be viewable by all members. Cameras are also positioned inside the main GTSC clubhouse and for closer monitoring of the garage for security. Live images from these two cameras can be viewed only by GTSC Committee members. Recorded Images from all cameras will only be viewed by the Committee member authorised to manage the system if an incident or accident occurs.

Static Cameras are positioned to ensure they do not focus on private homes, gardens or other areas of private property.

At no time will a camera be directed to automatically follow or track an individual as all the currently deployed cameras are fixed.

Materials or knowledge secured as a result of CCTV use will not be used for any commercial purpose. Images will never be released to the media for purposes of entertainment.

Images will only be released for use in the event of: -

- a) an investigation of an incident at GTSC. This will be authorised by an Officer of GTSC.
- b) an investigation of a specific incident or crime at the request of the police or other enforcement agency.
- c) A valid request in writing from a member or their authorised agent to investigate an incident in respect of the condition of Member's property stored at GTSC. This will be authorised by an Officer.

A request from an external body (e.g. solicitors) to view or release recordings will require authorisation by an Officer. In these circumstances recordings 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.

Training

Staff and Officers of GTSC have been trained in accordance with this policy and how to recognise legitimate requests for CCTV information/images.

Retention

Where possible, the CCTV system may operate 24 hours each day, every day of the year.

Recordings are activated by the CCTV System's motion detection system.

The system is periodically checked to confirm the functionality of the system and that the equipment is recording and that cameras are operational.

We endeavour to retain recorded CCTV images for long enough to allow for any incident to come to light (e.g. for a theft to be noticed) and to investigate it.

The retention period is 30 days. Where an incident has been identified and investigation is expected to take longer than the retention period a copy of the recording will be securely stored on the equipment of the authorised GTSC Committee member.

Data Quality

The planning and design have endeavoured to ensure that the CCTV Scheme will be effective and efficient 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.

The system has been designed to detect movement and make recordings of a quality that may fulfil the design requirements. However, it should be noted that factors (such as weather and illumination) may affect this ability.

To maintain and preserve the integrity of the recordings and facilitate their future use, the following procedures will be used:-

- a) Recordings should be saved of an event or incident where an access request has been approved and will be kept only for viewing by the relevant authorities.
- b) The Committee member responsible for the maintenance of the system will register the date and time of the recording, including the media file reference number. The Honorary Secretary will also

maintain a record of any Digital Media File released to the Police, other enforcement agencies or applicants.

Data Security

The system relies on Google Nest inbuilt security and privacy protection. Google's privacy policy can be accessed here: <https://policies.google.com/privacy>

We limit access to authorised individuals and regularly check that the CCTV system is working correctly.

Complaints

Any complaints about the GTSC CCTV system should be addressed to the Honorary Secretary.

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

Public awareness and signage

Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at access points and areas covered by the GTSC's CCTV system.