

East Dorset Sailing Club CCTV Policy

Introduction

East Dorset Sailing Club (EDSC) is fully committed to the safety of its members, visitors and contractors. To this extent has invested in the security of its buildings and facilities.

The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at EDSC. Common CCTV systems are based on digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 1998.

The person with delegated responsibility for data protection within EDSC is the Club's Honorary Secretary. The system comprises four cameras located externally around the Club. Three of these cameras are static but recording video, they may be monitored but are only available for use by approved members of the Committee at the club.

The harbour view camera is a Pan Zoom Tilt moveable camera made available for members' use via a password-protected application. Recording will not be engaged within the software available to members. The CCTV system is owned by the Club and will be subject to review annually on an annual basis.

Objectives of the CCTV System

- To protect the Club buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- To increase the personal safety of Members, visitors and contractors and reduce the fear of physical abuse, intimidation and crime.
- To support the police and the Harbour Master in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders on the Club premises.
- To protect members of the public and private property.
- To assist in the usage and management of the Club building premises on a day-to-day basis.

The harbour view camera:-

- Allows Members to check on prevailing weather conditions that might impact their decision to sail.
- Allows Cruiser Members to check their moorings.

In addition, Poole Harbour Control (The Harbour Master) will have access to this camera to assist in the safe operation of the harbour in the event of emergencies, co-ordinating a rescue or monitoring criminal activity in the harbour.

Statement of Intent

The Club will seek to comply with the Data Protection Act 1998, whether it be information, recordings or downloads which relate to the CCTV system. Cameras will be used to monitor activities around the Club building premises including the car park and other areas to identify adverse activity actually

occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the occupants within the Club and its visitors.

The Committee has been instructed to ensure that static cameras will not focus on private homes, gardens and other areas of private property. Materials or knowledge secured as a result of the CCTV system will not be used for any commercial purpose. Downloads, images and recordings will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Downloads Images and recordings will never be released to the media for purposes of entertainment. Full clarification can be obtained from the Honorary Secretary.

The planning and design of the existing CCTV system have endeavoured to ensure that the CCTV system will give maximum effectiveness and efficiency within available means, but it is not possible to guarantee that the CCTV 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.

Operation of the System

The system will be administered and managed by the Honorary Secretary, in accordance with the principles and objectives expressed in this Policy. The day-to-day management will be the delegated responsibility of the Honorary Secretary and Vice Commodore. The CCTV system will be operated 24 hours each day, every day of the year recording all activity. The system records vision but not sound.

CCTV System

The Honorary Secretary or a Committee member will check and confirm the efficiency of the system periodically and in particular that the equipment is properly recording and that the cameras are functional. Access to the CCTV system running from the static cameras will be strictly limited to the members of the Committee as approved by the Honorary Secretary.

Unless an immediate response to events is required, Members will be instructed that they must not direct the harbour view camera at an individual or a specific group of individuals.

The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Honorary Secretary. If permission is granted by the Honorary Secretary, the member of the public can visit the Club by appointment to inspect the camera in operation but they must be accompanied throughout the visit by a member of the committee. Any site visit by a member of the public may be immediately curtailed if the operational requirements of the CCTV system make this a necessity. Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs by the Honorary Secretary.

Monitoring Procedures

Camera surveillance will be maintained at all possible times for monitoring purposes and up to six weeks of recorded footage will be held on the memory system.

Video Download Procedures

Recordings may be viewed by the police and authorized officers from the police for the prevention and detection of crime. Permission to do this will be given by the Commodore or Honorary Secretary.

Each recording must be given a unique reference number and not stored with any other media. The person responsible for the recording will register the date, time and file reference number. Any recording needed for evidential reasons must be securely stored. The Honorary Secretary will maintain a record of the original and ensure only authorised parties are sent copies and that responsibility for handling under the Data Protection Act is expressed and incumbent on the recipients. A record will be maintained of the release of download recordings to the police or other authorized applicants. A register will be available for this purpose and will be kept by the Honorary Secretary.

Viewing of download recordings by the police or any external individual must be recorded in writing and in the register. Requests by the police can only be actioned under section 29 of the Data Protection Act 1998. Should a recording be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy.

Recordings will only be released to the police on the clear understanding that the recording remains the property of the Club, and both the images and information contained in it are to be treated in accordance with this Policy. The Club also retains the right to refuse permission for the police to pass to any other person the recording or any part of the information contained therein. Applications received from outside bodies (e.g. solicitors) to view or release download recordings will be referred to the Honorary Secretary. In these circumstances, downloads recordings will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request (this is referenced further down) or in response to a Court Order. A fee of £100 can be charged in such circumstances. The Club solicitors will be consulted on all requests.

Breaches of the Policy (including breaches of security)

Any breach of this Policy by Club members will be initially investigated by the Honorary Secretary or Commodore for him or her to take the appropriate disciplinary action. Any serious breach of the Policy will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach and prevent reoccurrence.

Assessment of the Scheme and CCTV Usage Policy

Performance monitoring, including random operating checks, may be carried out by the approved persons.

Complaints

Any complaints about the Club's CCTV system should be addressed to the Commodore. Complaints will be investigated by the Committee.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom “personal data” relate) with a right to data held about themselves, including those obtained by CCTV.

Requests for Data Subject Access should be made in writing to the Commodore. The Club reserves the right to make a charge of up to £10 (currently the statutory amount as permitted by Parliament).

Public Information

Copies of this Policy will be available to the public, by making a request to the Honorary Secretary. A copy of this Policy will be located in the Club Office on Club premises for information purposes for Members, visitors and contractors. It will also be available on the EDSC Members website.

System Maintenance and Monitoring

The system will be maintained in accordance with the Data Protection Act 1998. The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection. It will be the responsibility of the Committee to liaise with the maintaining company for the reporting of faults on the system, and any changes to the site which may affect the operation of the system. It will be the responsibility of a Committee member to arrange regular system reviews with the maintenance company.

Summary of Key Points

- This CCTV Usage Policy will be reviewed on an annual basis.
- The CCTV system is owned and operated by the Club.
- The CCTV system cannot be accessed by visitors/members of the public except by prior arrangement with the Honorary Secretary or Commodore and with good reason.
- Liaison meetings may be held with the police and other bodies.
- Copies of recordings may only be viewed by authorized staff and the police and with the express permission of the Honorary Secretary or Commodore.
- Copies required as evidence will be properly recorded, witnessed and packaged before copies are released to the police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Usage Policy.
- Any breaches of this Policy will be investigated by the Honorary Secretary or Commodore: an independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the Club committee.
- The system will be maintained on a regular basis by an approved contractor.

Further information and queries should be directed to the Honorary Secretary.

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