

THE NEW CLUB

CCTV POLICY

- 1. Introduction.** This policy will ensure that The New Club operates its CCTV in a way that complies with the minimum standards set out in the Data Protection Code of Practice for Surveillance Cameras and Personal Information (referred to in this policy as "the ICO code"), published by the Information Commissioner's Office (ICO).
- 2. Purpose.** The purpose of this policy is to outline the safeguards in place for the operation of, and access to, the CCTV systems in place and the images thereon.
- 3. Scope.** This policy applies to the use and management of CCTV equipment and images by the New Club.
- 4. Purpose of CCTV.** The New Club has installed and will use a CCTV system for the following purposes:
 - a. To provide a safe and secure environment for employees, other workers, club members and visitors to the New Club premises.
 - b. For the detection and prevention of crime in order to protect the New Club property and equipment.
- 5. Purpose Limitation.** The CCTV system in operation will record images only; there is no audio recording. It will not be used for any other purpose than that set out in Paragraph 4 above.
- 6. Responsibilities.** Specific responsibilities for complying with this policy are set out below.
 - a. The Club Accountant will be responsible for:
 - 1) Management of the Club CCTV system in compliance with the ICO code.
 - 2) Responding to requests to access images recorded by CCTV cameras in liaison with Information Governance staff.
 - 3) Maintaining a log of all requests to access images.
 - 4) Arranging for the regular maintenance and testing of the CCTV system to ensure the system is working properly and producing high quality images.
 - b. The Secretary will be responsible for:

- 1) Ensuring that this policy is communicated to Members, employees and other individuals contracted to work for Club.
- 2) Management of the process in place for subject access requests and requests under freedom of information legislation.
- 3) Carrying out an annual review of the policy and reviewing the continued need for CCTV.
- 4) Carrying out an annual audit of the process and the access logs to ensure compliance with the ICO code.
- 5) Monitoring the implementation of this policy.
- 6) Receiving reports of suspected misuse of the CCTV system or the information collected by the system.
- 7) Investigating suspected misuse along with the Club Accountant.
- 8) Ensuring that signage complies with the ICO code.

7. About the system. The CCTV system is a conventional static system:

- a. Cameras will record any movement detected in the area under surveillance together with the time, date and location of the movement. All cameras will operate 24 hours a day, all year round. The image quality allows identification of individuals in the area of coverage.
- b. Cameras will record images continuously, but the recorded images will only be viewed for the purposes described above or to respond to a request for information.
- c. The cameras are fixed and will not be used to zoom in on or follow an individual around.

8. Location of cameras. CCTV cameras are located as set out below.

Location	CCTV Cameras
Front entrance between main and inside door	One
Back entrance covering staff and back door entrances	Two
Ladies Cloakroom – coat area only	One
Gentlemen's' Cloakroom – coat area only	Two
Garage	One
Wine cellar	One
Gym	One

9. Signage. Signs will be clearly visible and readable so that employees, contracted individuals, members and other visitors to the Club are aware they are entering an area covered by CCTV.

10. **Recording and retention of images.** Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment will be undertaken on a regular basis to ensure it is working properly and that the system is producing high quality images.

11. **Image Retention.** Images will be retained for 14 days after which they will be automatically overwritten by the server. Images will only be transferred to another form of media where:

- a. A request for information has been received and is being actioned
- b. Images are requested for evidential purposes in legal proceedings
- c. An incident has occurred that is under local or police investigation

No images will be retained longer than needed for the purpose of the transfer.

12. **Access to and disclosure of images.** Access to, and disclosure of, images recorded on CCTV will be controlled and consistent with the purpose for which they were originally collected. Recorded images will be held securely to prevent unauthorised disclosure. Access to recorded images will be restricted to designated staff. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is taking place.

13. **Disclosure of images.** Disclosure of images to third parties will, in the main, be limited to the following:

- a. The police and other law enforcement agencies, where the images recorded could assist in:
 - 1) the prevention or detection of a crime.
 - 2) the identification and prosecution of an offender.
 - 3) the identification of a victim or witness.
- b. Prosecution agencies.
- c. Relevant legal representatives.
- d. Other third party requests will be carefully considered as wider disclosure may be unfair to the individuals concerned. The Club will only release information to a third party where it considers that their needs outweigh those of the individuals whose information has been recorded.
- e. All requests for disclosure and access to images will be logged, including the name of the requester, date of the disclosure, to whom the images have been provided and the reasons why the disclosure was required by the requester. If disclosure is refused the reasons will be recorded.

13. Subject Access Requests. Under data protection legislation, an individual has the right to view any personal information held about them by a Data Controller. Any individual who requests their personal information must provide the following information to help identify them:

- a. The date and approximate time of the recording.
- b. The location(s) the recording took place.
- c. A description of the individual or a photograph.

This information can be requested by e-mailing secretary@newclub.co.uk or by post at the address below:

The Secretary, The New Club, 86 Princes Street, EDINBURGH EH2 2BB

18. The New Club Policies and Legislation. This policy should be read in conjunction with the Club's Data Privacy Policy.



A P W CAMPBELL
Secretary