

CCTV PROCEDURE

VERSION 1

DATED 10 JANUARY 2019

REVISION HISTORY

1. GENERAL PRINCIPLES

- 1.1. Preston & District Rifle and Pistol Club may hereinafter be referred to as "PDRPC".
- 1.2. This document contains information, rules, policies and procedures concerning your membership and should be read in conjunction with the clubs privacy statement.
- 1.3. This procedure applies to all members and guests of PDRPC.
- 1.4. All members and guests must act in accordance with this procedure.
- 1.5. You are expected to read and observe all authorised notices that are displayed by the PDRPC.
- 1.6. Reference is made within this procedure to other policies and procedures of PDRPC, including the Constitution and Privacy Statement.
- 1.7. It is your responsibility to familiarise yourself with the following rules and procedures. Any breaches may result in action being taken in accordance with the constitution. If you have any concerns or require clarification on any issue(s), please raise them with committee.
- 1.8. PDRPC reserves the right in its absolute discretion to amend, replace or withdraw this procedure, without notice, as the needs of the company dictates it, and in any event, the procedure will be reviewed regularly. Any such changes will be notified to you as appropriate.
- 1.9. Please note that the PDF website version of this procedure is the only version that is controlled, maintained and updated. Any printed copies should therefore be viewed as 'uncontrolled' and as such, may not necessarily contain the latest updates and amendments.

2. PURPOSE AND SCOPE OF THE PROCEDURE

- 2.1. PDRPC uses closed circuit television (CCTV) images to provide a safe and secure environment for members and for guests/contractors to the Clubs premises and to protect PDRPC property.
- 2.2. This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 1998 and the Information Commissioner's Office CCTV Code of Practice.
- 2.3. The PDRPC CCTV facility records images only. There is no audio recording and therefore conversations are not recorded on CCTV
- 2.4. We reserve the right to monitor the use of our premises, equipment, devices, computers, network, applications, software, and similar assets and resources. In the event such monitoring occurs, it may result in the collection of personal information about you. This monitoring may include the use of CCTV cameras in and around our premises.

3. PURPOSES OF CCTV

The purposes of PDRPC installing and using CCTV systems include to:

- 3.1. Monitor the security of the PDRPC premises

- 3.1.1. Ensure that health and safety rules and PDRPC procedures are being strictly complied with
- 3.1.2. Assist in the prevention or detection of crime or equivalent malpractice
- 3.1.3. Assist in the identification of offenders for retraining/investigation
- 3.1.4. Detect, prevent or otherwise address fraud, security or safety issues as necessary
- 3.1.5. Assist with the identification of unauthorised actions or unsafe practices and to help in providing relevant evidence
- 3.1.6. Respond and defend a claim against PDRPC
- 3.1.7. Provide evidence to the PDRPCs insurers and Health & Safety Executive

4. LOCATION OF CAMERAS

- 4.1. Cameras are located at strategic points throughout PDRPC premises, principally at the entrance, Gun storage room and firing points.
- 4.2. PDRPC has positioned the cameras so that they only cover communal or public areas and they have been sited so that they provide clear images.
- 4.3. No camera focuses, or will focus, on toilets, shower facilities, changing rooms or private offices (which we don't possess).
- 4.4. All cameras are also clearly visible.
- 4.5. Appropriate signs are prominently and clearly displayed so that members, guests, contractors, the public and other visitors are aware they are entering an area covered by CCTV.

5. RECORDING AND RETENTION OF IMAGES

- 5.1. Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended.
- 5.2. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.
- 5.3. Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of PDRPC dictate.
- 5.4. As the recording system records digital images, any CCTV images that are held on the hard drive of a PC or server are deleted and overwritten on a recycling basis and, in any event, are not held for more than one month.
- 5.5. Once a hard drive has reached the end of its use, it will be erased prior to disposal. Images that are stored on, or transferred on to, removable media such as CDs are erased or destroyed once the purpose of the recording is no longer relevant.
- 5.6. In normal circumstances, this will be for a period of approximately one month. However, where there is a claim, an internal investigation or a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

6. ACCESS TO AND DISCLOSURE OF IMAGES

6.1. Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

6.2. The images that are filmed are recorded centrally and held in a number of secured locations.

6.3. Access to recorded images is restricted to the operators of the CCTV system and to those Committee who are authorised to view them in accordance with the purposes of the system.

6.4. Viewing of recorded images will take place in a restricted area to which other employees will not have access when viewing is occurring.

6.5. Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

6.5.1. The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness

6.5.2. Prosecution agencies, such as the Crown Prosecution Service

6.5.3. Relevant legal representatives including the PDRPC Insurers and Solicitors

6.5.4. Health and Safety Executive and other legal bodies to comply with our lawful obligations

6.5.5. Committee members involved with PDRPC disciplinary processes

6.5.6. Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

6.6. The Club Chairman (or Secretary/Treasurer/Competitions Captain) acting in their absence) is the only person who is permitted to authorise disclosure of information to external third parties such as law enforcement agencies.

6.7. All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

7. INDIVIDUALS' ACCESS RIGHTS

7.1. Under the Data Protection Act 1998 and GDPR 2018, individuals have the right on request to receive a copy of the personal data that PDRPC holds about them, including CCTV images if they are recognisable from the image.

7.2. If you wish to access any of your CCTV images, you must make a request to the PDRPC Chairman.

7.3. Your request must include the date and time when the images were recorded and the location of the particular CCTV camera, so that the images can be located and your identity can be established as the person in the images. Please note, PDRPC will always check the identity of the member making the request before processing it.

7.4. The Chairman will first determine whether disclosure of your images will reveal third party information as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

7.5. PDRPC reserves the right to withhold CCTV images if the images infringe on the data protection rights of third party individuals and/or the request is excessive and/or the request is unreasonable. If this is the case you will be advised by acknowledgement of third party rights.

7.6. If PDRPC is unable to comply with your request because access could prejudice the prevention or detection of the breaching of club rules, procedures and policy, crime or the apprehension or prosecution of offenders, you will be advised accordingly.

8. TRAINING

8.1. PDRPC will ensure that all Committee members handling CCTV images or recordings are trained in the operation and administration of the CCTV system and regarding the Data Protection Act 1998 and the General Data Protection Act 2018.

9. DATA PROTECTION AND PRIVACY

9.1. The Privacy Statement details the personal information held by PDRPC on members and how that information is used, in compliance with the relevant data protection regulations and laws. It describes your rights regarding the collection, correction and retention of your personal data, as well as right of access.

9.1.1. The Privacy Statement is available on the PDRPC website and all members/guests are issued a copy upon joining the club.

9.2. PDRPC will not share your information with third parties other than those identified within policies or as required to by law.