2024

Chairman

Wrekin Golf Club

1/11/2024

CCTV Surveillance Policy

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***CCTV Policy***

The Wrekin Golf Club has installed a CCTV system that has been operating solely for security purposes. However, the cameras record all individuals entering the building, and all entrances and exit areas are monitored to ensure the safety of staff, suppliers, and golf members. The golf club is the sole operator of the system, given its location within acres of open space with no properties within half a mile. This makes the CCTV system the most suitable option, and the Data Privacy Impact Assessment process is in place to address any privacy concerns.

The Wrekin Golf Club fully supports the use of CCTV cameras on the premises as it meets their needs and is compliant with any relevant legal obligations. The CCTV system is not used to spy or be intrusive to members, suppliers, visitors, or the Chairman. The General Manager and the Chairman are responsible for the operations of the CCTV system.

Signposts are located inside and outside the building to ensure that everyone entering or leaving the premises knows the CCTV cameras.

The CCTV system will allow the club to identify any of the following:

1. Accidents/ Near Misses
2. Loss items
3. Theft
4. Strangers gaining access.
5. Damages to the building (intentional or/and accidental damages)
6. Member(s) & Visitor(s), who are displaying bad behaviour.

According to the company's policy, any information stored on the system that records areas of concern will be made available to law enforcement if required. However, if there is no such requirement, the information will be overwritten every 30 days, and we will not have any evidence after that period.

Only two people within the management team will have access to the CCTV system, and they will be authorised to review, delete, or save CCTV footage. If the management team decides to keep the footage for more than 30 days, it should be entered into the Data Retention Register. The register will include a reason for retaining the footage and an agreed-upon review date for deletion.

Access to the CCTV footage's data retention will be limited to the Chairman and/or the General Manager as this will be classified as restricted data.

The CCTV system is highly valuable to the golf club as it effectively serves as a security measure. It is utilised for the protection of individuals and property, as well as for the investigation of crimes committed within the golf club. The technology also offers a greater opportunity to safeguard privacy, as it will never be utilised to infringe upon the right to respect private and family life.

**Data Privacy Impact Assessment**

Wrekin Golf Club have cameras around the main building whereby all administrative activities and retail services function.

|  |  |  |
| --- | --- | --- |
| *CCTV Benefits* | *CCTV Privacy Concerns* | *Any other comments* |
| * Building Secure to meet the business insurance company's needs.
* Record any break-ins into the building/ property.
* Monitor to location of missing items.
* Monitor some people in the building.
* Identify strangers wandering around the building.
* Identify any thefts.
* Locate young people separated from their parent(s).
* Record any bad behaviours.
* Record any falls or any other accidents.
* Members made aware that CCTV is all around the building and it is mainly for security reasons.
* Restricted access to the main system.
* Footage shared with the Insurance company and the police force if required.
* CCTV camera footage expires every 30 days.
* CCTV footage can be used as evidence in a court of law.
* The cameras are not an invasion of privacy.
* A competent nominated person to control and store the footage.
* The CCTV recordings/ images are clear and good quality.
* System is fit for purpose.
* All recordings will include time, date, and location.
 | * Members are not made aware of the cameras.
* Signage not visible.
* CCTV cameras compromised by cybercriminals.
* Staff members gain access to restricted areas.
* The footage required has been deleted.
* CCTV failure to work.
* The footage is used unlawfully.
* Young people will be captured on the CCTV for 30 days.
* Outdoor footage will be clear if the weather is good.
 | Before entering the building, please take note of the clear CCTV signage. It's important to note that there is no CCTV coverage at the front gate of the golf club. CCTV recording only covers a section of the car park and the inside of the building. It's essential to understand that CCTV cameras only record movements and do not capture any sound. All requests for CCTV footage will require a completed CCTV Request Form, authorised by the Chairman of the golf club. The person or member requesting the footage should have a reason or legal document to support their request. All requests will be dealt with within 30 days as we are adhering to the ICO requirement. The CCTV operator will regularly maintain the system and ensure it remains necessary and effective. The operator will carry out reviews to guarantee that the system has alternative interventions to minimise any risks of invading individual privacy. In addition, timely maintenance and repairs will be carried out to ensure the system functions correctly. |

All members of staff and volunteers are required to inform the Chairman if a person requests footage of themselves. The CCTV retention period is known by all staff, so the person requesting the footage will need to provide the accurate time and date of the footage.

If there are any issues or concerns, staff are required to seek advice from the Chairman of the golf club or from the Information Commissioner’s Office (ICO). The Chairman, and General Manager are authorised to operate the CCTV system. They are responsible for conducting maintenance checks, recording incidences, conducting training sessions, and upgrading the system. All staff are aware of the severe disciplinary penalties for misusing the CCTV system.

*See the Staff Privacy Notice and the Subject Access Request procedure regarding information.*

CCTV Retention and Deletion Process

The CCTV system is programmed to overwrite recordings every 30 days, as its purpose is to serve the intended security needs. It is the responsibility of the General Manager to ensure that the system continues to overwrite and delete the footage. If any CCTV footage is retained for any reason, it will be reviewed and discussed before any deletion is made. All deleted footage will be recorded on the register to ensure compliance with the Data Retention and Deletion Policy's retention period. Once the deletion process is complete, there is no way to recover the deleted footage.

*See Data Retention and Deletion Policy*

The Information Commissioner's Code of Practice offers guidance on best practices for the management team responsible for operating CCTV systems that capture images of individuals. Its key objective is to assist the management team in meeting their legal obligations.

System operators will adopt the following:

1. Use of a CCTV system must always specify the purpose for which it will be used.
2. The use of our CCTV system will consider its effect on members, visitors, suppliers, staff and management team and their privacy, therefore regular reviews will ensure its use remains justified.
3. We will ensure that we are transparent regarding using the CCTV system. This includes providing a known point of contact for access to information and complaints.
4. Ensure that we are clear regarding our responsibility and accountability for the CCTV system activities including images and information collected, held, and used.
5. We have clear rules, policies, and procedures in place, and this is communicated to all who need to comply with them.
6. Images and information will be deleted once their purposes have been discharged.
7. Retained images and information will be no longer than 30 days unless it is part of an investigation or a Subject Access Request.
8. The CCTV system operators are competent and approved to meet and maintain the standards required.
9. The images and the information will be subjected to appropriate security measures to safeguard against unauthorised access and use.
10. Complete effective reviews and audit reports to ensure legal requirements, policies and standards are maintained.
11. The CCTV system is used to support public safety and law enforcement with the aim of processing information of evidential value.
12. Any information used will be referenced accordingly.

CCTV Locations

|  |  |  |
| --- | --- | --- |
| Camera Number | Location | Area |
| 1 | Car Park | Wellington |
| 2 | Patio | Wellington |
| 3 | Bar | Wellington |
| 4 | Bar Steps | Wellington |
| 5 | Hallway | Wellington |
| 6 | Balcony  | Wellington |
| 7 | Reception | Wellington |
| 8 | Main Entrance | Wellington |

Report to: Property Director

Date:

Main Contact:

Attendees:

Chairperson:

|  |
| --- |
| Report Summary |
| Type of Report |  |
| Report Title | CCTV System Review |
| Purpose of Report |  |
| Recommendations |  |
| Alternative Options Considered |  |
| Reason for Recommendations |  |

CCTV Camera incident

|  |  |  |  |
| --- | --- | --- | --- |
| Date | Contact Person | Camera Number and Location | Action(s) |
|  |  |  |  |
|  |  |  |  |
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|  |  |  |  |
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|  |  |  |  |

Contact the Surveillance Camera Commissioner

2 Marsham Street

1st Floor, Peel

London

SW1P 4DF

Email: scc@sccommissioner.gsi.gov.uk

More information

[www.gov.uk/surveillance-camera-commissioner](http://www.gov.uk/surveillance-camera-commissioner)

Wrekin Golf Club may review this policy over the next 12 months as we continue improving our services and security facilities.