



Cuckfield Cricket Club – CCTV Policy

Introduction

Cuckfield Cricket Club uses closed circuit television (CCTV) images to provide a safe and secure environment for members, and visitors to the Club's premises, and to protect the Club's property.

This policy sets out the use and management of the CCTV equipment and images in compliance with the Data Protection Act 2018 and the Information Commissioner's Office CCTV Code of Practice.

The CCTV Scheme has been registered with the Information Commissioner and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice. The Club will treat the system and all information, documents and recordings obtained and used as data protected by the Act.

Objectives

The objectives of using CCTV at Cuckfield Cricket Club are to:

- protect the club buildings, equipment and members' property stored at the club;
- assist in the prevention and detection of crime;
- support the Police in the identification and prosecution of offenders; and
- assist with the identification of unauthorised actions or unsafe practices.

Location of cameras


Cameras will be used to monitor activities within the Club grounds. Cameras are located at strategic points around the main pavilion and the north field pavilion.

Cameras only cover the exterior of the property and there are no cameras sited inside any buildings. All cameras are clearly visible. At no time will a camera be directed to follow or track an individual as all the currently deployed cameras are fixed. Static cameras are positioned to ensure they do not focus on private homes, gardens, private property or the highway. The planning and design of the CCTV system has endeavoured to ensure maximum effectiveness and efficiency, but it is not possible to guarantee that it will cover or detect every single incident taking place in the areas of coverage.

Signs, as required by the Code of Practice of the Information Commissioner, are prominently displayed so that all users of the ground are aware that they are in an area that is covered by CCTV.

Recording and retention of images

Images produced by the CCTV equipment are as clear as possible so that they are effective for the purposes for which they are intended. 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.



Images are recorded in real-time (24 hours a day throughout the year). 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 week.

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 are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of one month. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

Access to and disclosure of images

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.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to individuals whom the Management Committee has authorised to view them in accordance with the purposes of the system. This includes the Officers of the Club who make up the Management Committee. Any viewing of recorded images will take place in an area where only those authorised can view them.

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:

- 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;
- prosecution agencies, such as the Crown Prosecution Service;
- relevant legal representatives;
- management committee members involved with disciplinary processes; and
- 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).

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

The Management Committee are the only people who are permitted to authorise disclosure of information to external third parties such as law enforcement agencies.

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. Requests must be made formally in writing.

Individual's rights

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

If you wish to access any of your CCTV images, you must make a written request to the Hon. Secretary (secretary@cuckfieldcc.co.uk). 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.

Note: The Club will always check the identity of the person making the request before processing it.

The Management Committee 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.

If the Club is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Covert recording

The Club will not undertake covert recording without the written authorisation of the management committee and only where there is good cause to suspect that criminal activity or equivalent malpractice is taking, or is about to take, place and informing the individuals concerned that the recording is taking place would seriously prejudice its prevention or detection. Covert monitoring may include both video and audio recording.

Covert monitoring will only take place for a limited and reasonable amount of time consistent with the objective of assisting in the prevention and detection of particular suspected criminal activity or equivalent malpractice. Once the specific investigation has been completed, covert monitoring will cease.

Information obtained through covert monitoring will only be used for the prevention or detection of criminal activity or equivalent malpractice. All other information collected in the course of covert monitoring will be deleted or destroyed unless it reveals information which the Club cannot reasonably be expected to ignore.

Training

The Club will ensure that all those handling CCTV images or recordings receive a copy of this policy and understand the impact of the Data Protection Act with regard to that system.

Implementation

The Management Committee are responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct reviews of the Club's use of CCTV.

Breaches of the Policy (including breaches of security)

Any breach of this Policy by Club officials will be initially investigated by the Club Hon. Secretary for him/her to take the appropriate disciplinary action.

Complaints

Any complaints or enquiries about the Club's CCTV system should be addressed to the Club Hon. Secretary (secretary@cuckfieldcc.co.uk).

Public Information

Copies of this Policy will be available on the Club website or by making a request to the Club Hon. Secretary (secretary@cuckfieldcc.co.uk).

8 February 2021

Checklist

This CCTV system and the images produced by it are controlled by Cuckfield Cricket Club who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

We have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of members, visitors and their property. It will not be used for other purposes. We conduct an annual review of our use of CCTV.

	Checked (Date)	By	Next Review
Notification has been submitted to the Information Commissioner and the next renewal date recorded.	February 2021	HT	February 2022
There is a named individual who is responsible for the operation of the system.	February 2021	GFM	February 2022
The problem we are trying to address has been clearly defined and installing cameras is the best solution. This decision should be reviewed on a regular basis.	February 2021	MC	February 2022
A system has been chosen which produces clear images which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required.	February 2021	GFM	February 2022
Cameras have been sited so that they provide clear images.	February 2021	GFM	February 2022
Cameras have been positioned to avoid capturing the images of persons not visiting the premises.	February 2021	GFM	February 2022
There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s).	February 2021	GFM	February 2022
Images from this CCTV system are securely stored, where only a limited number of authorised persons may have access to them.	February 2021	GFM	February 2022
The recorded images will only be retained long enough for any incident to come to light (eg for a theft to be noticed) and the incident to be investigated.	February 2021	GFM	February 2022
Except for law enforcement bodies, images will not be provided to third parties.	February 2021	GFM	February 2022
The potential impact on individuals' privacy has been identified and taken into account in the use of the system.	February 2021	MC	February 2022
The organisation knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made.	February 2021	MC	February 2022
Regular checks are carried out to ensure that the system is working properly and produces high quality images.	February 2021	GFM	February 2022

MC – Management Committee; GGFM – Grounds & Facilities Manager; HT – Hon Treasurer.