



## Chobham & District Rifle Club

### Closed Circuit Television (CCTV) Policy and Procedures

Issue 4 (Draft 6) - 24 Nov 2014

#### Introduction

This is the policy document for the Closed Circuit Television (CCTV) system's installation and use at premises of Chobham & District Rifle Club, Station Road, Chobham, Surrey, GU24 8AL.

This document provides the policy and the procedures that the club employs to implement the policy and to comply with the law.

#### Wording

The word Image in the context of this document, means any still or moving image available from the CCTV system.

#### Policy statement

CCTV is installed in the Club premises primarily to monitor the security of the armoury. It is also used to monitor range and personal safety.

Cameras are located at various places on the premises with these objectives in mind.

Images from some of the cameras are recorded. As images are recorded they may also be used over and above the primary purposes defined above to assist in the safety and security of club members and the public, subject to the Law and the procedures detailed within this document.

#### CCTV and the Law

The use of CCTV falls within the scope of the Data Protection Act 1998 ("the 1998 Act"). This code of practice follows the recommendations issued by the Data Protection Commissioner in accordance with powers under Section 51 (3)(b) of the 1998 Act.

In order to comply with the requirements of the 1998 Act, data must be:

- Fairly and lawfully processed

- Processed for limited purposes and not in any manner incompatible with those purposes

- Adequate, relevant and not excessive

- Accurate

- Not kept for longer than is necessary

- Processed in accordance with individuals' rights

- Secure

#### Data Protection statement

The Chairman and Vice Chairman are the designated Data Controllers under Section 4(4) of the Act.

CCTV is installed for the purposes defined in the policy statement.

Access to stored images will be controlled on a restricted basis within the Club.



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Use of images, including the provision of images to a third party, will be in accordance with the Club's Data Protection registration.

External and internal signage are displayed on the premises and on the Club web site stating of the presence of CCTV, and indicating the names of the Data Controllers and a contact number during office hours for enquiries.

#### **Access to Images statement**

It is important that access to, and disclosure of, images recorded by CCTV and similar surveillance equipment is restricted and carefully controlled, not only to ensure that the rights of individuals are preserved, but also to ensure that the chain of evidence remains intact should the images be required for evidential purposes.

#### **Procedures**

##### **Procedure 1- RETENTION OF IMAGES**

Images from cameras are recorded on the computer system ("the recordings"). The system is set-up with access controls in place.

Recordings which are not required for the purposes defined in the Policy Statement, will not be retained for longer than is necessary and no longer than 12 weeks.

Where recordings are retained for the purposes defined in the Policy statement, these will be held in secure storage, and access controlled.

##### **Procedure 2 - ACCESS TO IMAGES BY DATA CONTROLLERS**

Access to recorded images is restricted to the Data Controllers, who will decide whether to allow requests for access by Data Subjects and/or third parties (see below).

Viewing of images must be documented as follows using the form at Appendix 2:

- The name of the person removing from secure storage, or otherwise accessing, the recordings
- The date and time of removal of the recordings
- The name(s) of the person(s) viewing the images (including the names and organisations of any third parties)
- The reason for the viewing
- The outcome, if any, of the viewing
- The date and time of replacement of the recordings

##### **Procedure 3 - REMOVAL OF IMAGES FOR USE IN LEGAL PROCEEDINGS**

In cases where recordings are removed from secure storage for use in legal proceedings, the following must be documented using the form at Appendix 2 :



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- The name of the person removing from secure storage, or otherwise accessing, the recordings
- The date and time of removal of the recordings
- The reason for removal
- Any crime incident number to which the images may be relevant
- The place to which the recordings will be taken
- The signature of the collecting police officer, where appropriate
- The date and time of replacement into secure storage of the recordings

#### Procedure 4 - ACCESS TO IMAGES BY THIRD PARTIES

Requests for access to images will be made using the 'Application to access to CCTV images' form (which is at Appendix 1), accompanied by a £10 fee (which is non-refundable if the request is declined).

The Data Controllers will assess applications and decide whether the requested access will be permitted. Disclosure of recorded images to third parties will only be made in limited and prescribed circumstances. For example, in cases of the prevention and detection of crime, disclosure to third parties will be limited to the following:

Law enforcement agencies where the images recorded would assist in a specific criminal enquiry

Prosecution agencies

Relevant legal representatives

People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries or criminal proceedings)

All requests for access or for disclosure should be recorded. If access or disclosure is denied, the reason should be documented as above.

#### Procedure 5 - ACCESS BY DATA SUBJECTS

This is a right of access, which is provided by section 7 of the 1998 Act. Requests for access to images will be made using the 'Application to access to CCTV images' form (which is at Appendix 1), accompanied by a £10 fee (non-refundable if the request is declined).

Individuals should also be provided with the Club CCTV Policy which describes the type of images which are recorded and retained, the purposes for which those images are recorded and retained, and information about the disclosure policy in relation to those images.

#### Procedure 6 - PROCEDURES FOR DEALING WITH AN ACCESS REQUEST

All requests for access by Data Subjects will be dealt with by the Chairman. The



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Data Controllers will locate the images requested. The Data Controllers will determine whether disclosure to the Data Subject would entail disclosing images of third parties.

The Data Controllers will need to determine whether the images of third parties are held under a duty of confidence.

If third party images are not to be disclosed, the Data Controllers will arrange for the third party images to be disguised or blurred. If the CCTV system does not have the facilities to carry out that type of editing, an editing company may need to be used to carry it out. If an editing company is used, then the Data Controllers must ensure that there is a contractual relationship between them and the editing company, and;

- That the editing company has given appropriate guarantees regarding the security measures they take in relation to the images
- The written contract makes it explicit that the editing company can only use the images in accordance with the instructions of the Data Controllers
- The written contract makes the security guarantees provided by the editing company explicit

The Chairman will provide a written response to the Data Subject within 21 days of receiving the request setting out the Data Controllers' decision on the request.

A copy of the request and response should be retained.

Additional fees may be required, payable up front, if anything more than just viewing the image is required.

#### Procedure 7 - ENQUIRIES

All enquiries regarding this policy should be made to the Chairman.



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#### Document Change Control:

<b>Issue</b>	<b>DATE</b>	<b>CHANGE</b>
Issue 4 Draft 5	23 Nov 2014	Put on Website
Issue 4 Draft 6	24 Nov 2014	Removed section 7 and renumbered.



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#### APPENDIX 1

#### Chobham & District Rifle Club - APPLICATION FOR CCTV DATA ACCESS

ALL Sections must be fully completed.

Attach a separate sheet if needed.

Name and address of Applicant
Name and address of "Data Subject" – i.e. the person whose image is recorded
If the Data Subject is not the person making the application, please obtain a signed consent from the Data Subject opposite
Data Subject signature.....
If it is not possible to obtain the signature of the Data Subject, please state your reasons.
Please state your reasons for requesting the image.
Date on which the requested image was taken.
Time at which the requested image was taken.
Location of the Data Subject at time image was taken (i.e. which camera or cameras.)
Full description of the individual, or alternatively, attach to this application a range of photographs to enable the Data Subject to be identified by the operator.
Please indicate whether you (the Applicant) will be satisfied by viewing the image only.
Any requirements other than viewing the image may result in an additional fee.

On receipt of a fully completed application and the £10 fee, a response will be provided as soon as possible, and in any event within 40 days. In the event of a declined application the fee is non-refundable.



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CLUB USE ONLY	
Access granted (tick)	
Access not granted (tick)	
Reason for not granting access:	
Data Controller's name: Signature: Date:	



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#### Appendix 2

#### Chobham & District Rifle Club - RECORD OF ACCESS TO CCTV DATA

Name of person accessing data	Date and time	Name of person viewing data		Reason for viewing (incl crime number if applicable)	Data Removed Y / N Signature of person removing if applicable