



# Newtongrange Star Football Club

## CCTV Policy – June 2024

### 1. Installation

- a. Newtongrange Star Football Club (the Club) uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime, to provide a safe and secure environment for Club members and visitors, and to prevent the loss or damage to club property.
- b. CCTV surveillance at the Club is intended for the purposes of:
  - protecting the Club buildings;
  - promoting the health and safety of Club members and visitors;
  - reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
  - supporting the Police in a bid to deter and detect crime;
  - assisting in identifying, apprehending and prosecuting offenders.
- c. The system currently comprises of 8 fixed cameras (5 internal and 3 external).
- d. The CCTV system is owned and operated by the Club the deployment of which is determined by the Club's Committee. The CCTV is a standalone system and operated by the Club.
- e. The CCTV is monitored centrally from the bar area.
- f. The CCTV is accessible remotely via an mobile phone app and available only to the Premises Manager, Club President and 1 nominated Committee Member.
- g. The Club's CCTV Scheme is registered with the Information Commissioner's Office under the terms of the Data Protection Act (the Act). This policy outlines the Club's use of CCTV and how it complies with the Act.
- h. All authorised operators, and those noted in f. above with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. All individuals with access are aware of the restrictions in relation to access to, and disclosure of recorded images.
- i. The Club complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- j. The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring employee performance.

### 2. Justification for Use of CCTV

- a. The use of CCTV on the exterior of the Club buildings for security purposes has been deemed to be justified by the Committee. The system is intended to capture images of intruders or of individuals damaging Club property or removing goods without authorisation or of antisocial behaviour or of instances of fly-tipping.
- b. In other areas of the Club where CCTV has been installed, e.g. foyer, lounge, hall, bar, the Club has demonstrated that there is a proven risk to security and/or health & safety and that the installation of CCTV is proportionate in addressing such issues that may have arisen prior to the installation of the system. The Club's position is in line with guidance received from Police Scotland.
- c. CCTV systems will not be used to monitor normal staff or customer activity at the Club.

### 3. Data Protection Impact Assessments

- a. Where new CCTV systems or cameras are to be installed, the Club will carry out a full Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation.

### 4. Location of Cameras

- a. Cameras will be sited so they only capture images relevant to the purposes for which they are installed, and care will be taken to ensure that reasonable privacy expectations are not violated.
- b. The Club will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The Club will make every effort to position cameras so that their coverage is restricted to the Club premises, which may include outdoor areas.
- c. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. Newtongrange Star Football Club has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

- d. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.
  - e. CCTV Video Monitoring and Recording of Public Areas may take place for the following purposes:
    - Protection of Club buildings and property: The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services
    - Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
    - Verification of Security Alarms: Intrusion alarms, exit door controls, external alarms
    - Video Patrol of Public Areas: Parking areas, Main entrance/exit gates, Traffic Control
    - Criminal Investigations (carried out by police): Robbery, burglary, distributions and use of illegal drugs, and theft surveillance
- 5. Covert Surveillance**
- a. Newtongrange Star Football Club will not engage in covert surveillance.
- 6. Notification**
- a. A copy of this CCTV Policy will be displayed in the social club and will be made available on the Club website.
  - b. The location of CCTV cameras will be indicated by adequate signage. Such signage will be placed at each location in which a CCTV camera is sited to indicate that CCTV is in operation.
- 7. Storage and Retention**
- a. The images captured by the CCTV system will be retained for a maximum of 10 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.
  - b. The images/recordings will be stored in a secure environment with a log of access kept.
  - c. Access will be restricted to authorised personnel only. Supervising the access and maintenance of the CCTV System is the responsibility of the Lead CCTV Operator and the Club President.
  - d. In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.
- 8. Access**
- a. Recorded footage and the monitoring equipment will be securely stored in a restricted area. Unauthorised access to that area will not be permitted at any time. A log of access to footage will be maintained.
  - b. Access to the CCTV system and stored images will be restricted to authorised personnel only.
  - c. When accessing images two authorised persons must be present. A written record of access will be made. Records of access will be kept.
  - d. A record of the date of any disclosure request in line with the Data Protection Act along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.
  - e. Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage.
  - f. In relevant circumstances, CCTV footage may be accessed:
    - By the police where Newtongrange Star Football Club are required by law to make a report regarding the commission of a suspected crime; or
    - Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Newtongrange Star Football Club's property, or
    - To the HSE and/or any other statutory body charged with child safeguarding; or
    - To assist the Lead CCTV Operator in establishing facts in cases of unacceptable behaviour; or
    - To data subjects (or their legal representatives), pursuant to a Subject Access Request; or
    - To individuals (or their legal representatives) subject to a court order; or
    - To the Club insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.
- 9. Subject Access Requests (SAR)**
- a. Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
  - b. Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
  - c. The Club will respond to requests within 30 calendar days of receiving the request in line with the Club's right of access policy.
  - d. The Club reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation or where deemed frivolous.

- e. A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.
- f. In giving a person a copy of their data, the Club will provide a series of still pictures. However, other images of other individuals will be obscured before the data is released.
- g. Where footage contains images relating to 3rd parties, the Club will take appropriate steps to mask and protect the identities of those individuals.

#### **10. Complaints**

- a. Complaints and enquiries about the operation of CCTV within the Club should be directed in writing to the Club Committee in the first instance.

#### **11. Staff Training**

- a. Individuals authorised to access the CCTV system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.
- b. Individuals will receive appropriate training to enable them to identify and handle different requests according to regulations.
- c. Individual misuse of surveillance system information will lead to disciplinary proceedings.

#### **12. Responsibilities**

- a. The Lead CCTV Operator (or nominated deputy) will:
  - Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Newtongrange Star Football Club
  - Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within Club
  - Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
  - Ensure that the CCTV monitoring at Newtongrange Star Football Club is consistent with the highest standards and protections
  - Review camera locations and be responsible for the release of any information or recorded CCTV materials stored in compliance with this policy
  - Maintain a record of access (e.g. an access log) to or the release of any material recorded or stored in the system
  - Ensure that monitoring footage is not duplicated for release
  - Ensure that the perimeter of view from fixed location cameras both internally and externally conforms to this policy
  - Give consideration to feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
  - Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the Club and be mindful that no such infringement is likely to take place
  - Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
  - Ensure that monitoring footage is stored in a secure place with access by authorised personnel only
  - Ensure that images recorded on digital recordings are stored for a period not longer than 10 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
  - Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
  - Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics and behaviours
  - Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

**For and on behalf of the Committee of Newtongrange Star Football Club**

**June 2024**