

CCTV POLICY

HRUFC CCTV Policy

Introduction

Harlow Rugby Union Football club (HRUFC) is fully committed to the safety of its Staff, Members and Visitors and to this extent has invested in the security of its buildings and facilities. The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at HRUFC.

Common CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 1998. The person ultimately responsible for data protection within Harlow Rugby Union Football club (HRFC) is the Club Secretary. The system comprises a number of dome cameras located both internally and externally around the Club. All cameras may be monitored and are only available for use by approved members of staff.

The CCTV system is owned by the Club and will be subject to review annually on an annual basis.

Objectives of the CCTV System

The objectives of the CCTV system are: –

- To protect the Club buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- To increase the personal safety of Staff, Members and visitors and reduce the fear of physical abuse, intimidation and crime.
- To support the police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders on the Club.
- To protect members of the public and private property.
- To assist in the usage and management of the Club building on a day to day basis.

Statement of Intent

The Club will comply with the Data Protection Act 1998, whether it be information, recordings and downloads which relate to the CCTV system.

Cameras will be used to monitor activities within the Club buildings, the car parks and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the occupants within the Club, together with its visitors.

Staff have been instructed to ensure that static cameras will not focus on private homes, gardens and other areas of private property.

Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without an authorization from the Club Secretary being obtained.

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. Full clarification can be obtained from the Club Secretary.

The planning and design of the existing CCTV system has endeavored to ensure that the CCTV system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed at all access routes to areas covered by the Club CCTV.

Operation of the System

The system will be administered and managed by the Club Secretary, in accordance with the principles and objectives expressed in this Policy.

The day-to-day management will be the responsibility of the Club Manager.

The CCTV system will be operated 24 hours each day, every day of the year.

CCTV System

The Club Manager will check and confirm the efficiency of the system daily and in particular that the equipment is properly recording and that cameras are functional.

Access to the CCTV will be strictly limited to the members of staff approved by the Club Secretary.

Unless an immediate response to events is required, staff must not direct cameras at an individual or a specific group of individuals.

The CCTV system may generate a certain amount of concern from members of the public. Any concern expressed by a member of the public should be referred to the Club Secretary. If permission is granted by the Club Secretary, the member of the public must be accompanied throughout the visit by a member of staff.

Any site visit by a member of the public may be immediately curtailed if the operational requirements of the CCTV System make this a necessity.

Other administrative functions will include maintaining hard disc space, filing and maintaining occurrence and system maintenance logs by the Club Manager.

In the event of an emergency, which requires an immediate contact with an emergency service, that emergency service will be contacted by a member of staff.

Liaison

Liaison meetings may be held with all bodies involved in the support of the CCTV system ie maintenance contractors, approved staff, police etc.

Monitoring Procedures

Camera surveillance may be maintained at times for monitoring purposes.

Out of hours the system will connect to an external Remote Video Receiving Centre (RVRC) in the event of a security alarm activation.

Video Download Procedures

Recordings may be viewed by the police and authorized officers from Essex Police for the prevention and detection of crime. Permission to do this will be given by the Club Secretary.

A record will be maintained of the release of downloads to the police or other authorized applicants. A register will be available for this purpose and will be kept by the Club Manager.

Viewing of downloads by the police must be recorded in writing and in the register. Requests by the police can only be actioned under section 29 of the Data Protection Act 1998.

Should a download be required as evidence, a copy may be released to the police under the procedures described in the above paragraphs of this Policy. Downloads will only be released to the police on the clear understanding that the disc remains the property of the Club, and both the disc and information contained on it are to be treated in accordance with this Policy. The Club also retains the right to refuse permission for the police to pass to any other person the disc or any part of the information contained thereon.

Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the Club Secretary. In these circumstances' downloads will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. A fee of £100,00 can be charged in such circumstances. The club solicitors will be consulted on all requests .

Breaches of the Policy (including breaches of security)

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

Any serious breach of the Policy will be immediately investigated, and an independent investigation carried out to make recommendations on how to remedy the breach.

Assessment of the Scheme and CCTV Usage Policy

Performance monitoring, including random operating checks, may be carried out by the approved persons.

Complaints

Any complaints about the Club's CCTV system should be addressed to the Club Secretary.

Complaints will be investigated in accordance with Section 9 of this Policy.

Access by the Data Subject

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV.

Requests for Data Subject Access should be made in writing to the Club Secretary.

Public Information

Copies of this Policy will be available to the public, by making a request to the Club Secretary.

A copy of this Policy will be located in the Club Office for information purposes to members of staff.

System Maintenance and Monitoring

The system will be maintained in accordance with the Data Protection Act 1998.

The system will only be maintained and monitored by companies which carry the relevant accreditation from the Security Systems and Alarm Inspection Body (SSAIB) or National Security Inspection (NSI).

It will be the responsibility of the Club Manager to liaise with the maintaining company for the reporting of faults on the system, any changes to the site which may affect the operation of the system.

It will be the responsibility of the Club Manager to arrange regular system reviews with the maintaining company.

Summary of Key Points

- This CCTV Usage Policy will be reviewed on an annual basis.
- The CCTV system is owned and operated by the Club.
- The CCTV system cannot be accessed by visitors/members of the public except by prior arrangement with the Club Secretary and with good reason.
- Liaison meetings may be held with the police and other bodies.
- Copies of downloads may only be viewed by authorized staff and the police and with the express permission of the Clubs Secretary.
- Copies required as evidence will be properly recorded witnessed and packaged before copies are released to the police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any Covert Surveillance or use of a Covert Human Intelligence Source being considered or planned as part of an operation must comply with the CCTV Usage Policy.
- Any breaches of this Policy will be investigated by the Club Secretary: an independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the Club Secretary.
- The system will be maintained on a regular basis by an approved contractor.

Further information and queries should be directed to the Club Secretary via Secretary@HarlowRugby.Club