



Sowerby Bridge Church Institute Cricket Club CCTV policy

Policy summary

The Sowerby Bridge Church Institute cricket club (SBCI CC) has in place a Closed-Circuit Television (CCTV) surveillance system. This policy details the purpose, use and management of the CCTV system and details the procedures to be followed in order to ensure that SBCI CC complies with relevant legislation and Codes of Practice where necessary.

This applies to the CCTV system capturing images and sound of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

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Introduction

1. SBCI CC uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime/anti-social behaviour and to monitor the SBCI CC buildings and immediate surrounds in order to provide a safe and secure environment for volunteers, players and visitors, and to prevent the loss of or damage to SBCI CC contents and property.
2. The CCTV system is owned by SBCI CC The Astleys Blackwall Lane Sowerby Bridge HX6 2UB and managed by the committee of SBCI CC. SBCI CC is the system operator, and data controller, for the images produced by the CCTV system.
3. The CCTV system is operational and is capable of monitoring for 24 hours a day, every day of the year.

Purpose

4. This Policy governs the installation and operation of all CCTV cameras at The Astleys home of SBCI CC.
5. CCTV surveillance is used to monitor and collect visual images and sound for the purposes of:
 - Protecting the buildings and assets 24hours 365 days a year.
 - 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; and
 - Ensuring that the rules are respected so that the site/s can be properly managed.

Scope

6. This policy applies to SBCI CC, Blackwall Lane HX6 2UB
7. This policy is applicable to members, visitors and the general public in the vicinity of the club house and associated buildings and must be followed by all SBCI CC members.
8. All members involved in the operation of the CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
9. All systems users with responsibility for accessing, recording, disclosing or otherwise processing CCTV images and sound will have relevant skills and training on the operational, technical and privacy considerations and fully understand the policies and procedures.
10. Where required, CCTV operators will be properly licensed by the Security Industry Authority as follows:
 - A license is not needed as all the persons overseeing the CCTV are undertaking the work as a volunteer and receives no payment in kind or a reward for services.

Definitions

CCTV – closed circuit television camera. A TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes and where access to their content is limited by design only to those able to see it.

Covert surveillance - observation, and/or recording, carried out without the subject's knowledge, and may be done using camera's or devices that are not visible to the subject.

Data controller - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of CCTV images.

Data Protection Act 2018 (DPA) - UK data protection framework, regulating the processing of information relating to individuals.

Facial/ automated recognition - the use of camera technology to identify individuals' faces and to make automated matches.

Data Protection Act 2018 (DPA 2018)

ICO CCTV Code of Practice 2017 - recommendations on how the legal requirements of the Data Protection Act 1998 can be met when using CCTV, issued by the Information Commissioner's Office. The guidance will be updated to comply with current legislation.

Security Industry Authority (SIA) - the organisation responsible for regulating the private security industry in the UK, under which private use of CCTV is licensed. It is an independent body reporting to the Home Secretary, under the terms of the [Private Security Industry Act 2001](#).

Surveillance Camera Code of Practice 2013 - statutory guidance on the appropriate and effective use of surveillance camera systems issued by the Government in accordance with Section 30 (1) (a) of the Protection of Freedoms Act 2012.

System Operator - person or persons that take a decision to deploy a surveillance system, and/or are responsible for defining its purpose, and/or are responsible for the control of the use or the processing of images or other information obtained by virtue of such system.

System User - person or persons who may be employed or contracted by the system operator who have access to live or recorded images or other information obtained by virtue of such a system.

Policy

Policy statement

11. SBCI CC will operate its CCTV system in a manner that is consistent with respect for the individual's privacy and proportionate to the activity being undertaken.
12. SBCI CC complies with Information Commissioner's Office (ICO) CCTV Code of Practice 2017 to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.

13. The CCTV system will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
14. 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.
15. Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:
 - Cover the specific area to be monitored only;
 - Keep privacy intrusion to a minimum;
 - Ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage);
 - Minimise risk of damage or theft.
16. CCTV will **not** be used for the purposes of streaming live cricket or practise sessions.

Location and signage

17. Cameras are sited to ensure that they cover the key premises as far as is possible. Cameras are installed on the main clubhouse to include coverage of the immediate surrounds such as roadways, car parks, store buildings, containers and the cricket outfield
18. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the above locations in item 17.
19. Signs are sited at locations in order to inform club members, visitors and members of the public that CCTV is in operation.
20. The signage indicates that monitoring and recording is taking place, for what purposes, the hours of operation, who the system owner is and where complaints/questions about the systems should be directed.
21. Signage templates are included in Appendix 1.

Monitoring and recording

22. Cameras are monitored on secure private mobiles devices, which enable authorised persons able to respond to incidents identified on CCTV monitors.
23. Images and sound are recorded on secure servers and are viewable by a small number (between 4 & 6) committee designated persons.
24. Where SBCI CC use Cloud-based storage they will ensure that such storage is located in the European Economic Area (EEA), and that all relevant security and data protection measures are in place.
25. Recorded material will be stored in a way that maintains the integrity of the image/sound and information to ensure that metadata (e.g. time, date and location) is recorded reliably, and compression of data does not reduce its quality.

26. No viewing of recordings will be undertaken unless an incident or crime is identified and the data is required to further a club or police investigation.
27. The cameras installed provide images and sound that are of suitable quality for the specified purposes for which they are installed and all cameras are checked regularly and serviced to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
28. All images recorded by the CCTV System remain the property and copyright of SBCI CC.

Covert surveillance

29. SBCI CC will not engage in covert surveillance.

Facial Recognition

36. Where cameras are used to identify people's faces, SBCI CC will ensure that we use high quality cameras to make sure we are capturing the individual(s) accurately enough to fulfil the intended purpose.

Live Streaming

38. The CCTV System will not be utilised for live streaming of cricket matches or practise sessions or any other associated activities

Data Protection

40. SBCI CC In its administration of its CCTV system, complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Data Protection Impact Assessments

41. The CCTV system is subject to a Data Protection Impact Assessment. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This will include consultation with relevant internal and external stakeholders.

Applications for disclosure of images

42. Requests by individual data subjects for images/sound relating to themselves via a Subject Access Request should be submitted to the SBCI CC committee together with proof of identification. Further details of this process can be obtained from the club secretary who's details are on the club website.
43. In order to locate the images on the system sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
44. Where SBCI CC is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual

has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.

45. A request for images made by a third party should be made to the club secretary.
46. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
47. Such disclosures will be made at the discretion of the club executive, with reference to relevant legislation and where necessary, following advice from our legal advisor etc.
48. A log of any disclosure made under this policy will be held by "The Committee" itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
49. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
50. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
51. Images may be released to the media for purposes of identification. Any such decision to disclose will be taken in conjunction with the Police and/or other relevant law enforcement agencies.
52. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of recordings (images and sound)

53. Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV recordings will be retained for no longer than 14 calendar days from the date of recording. Recordings will be automatically overwritten or destroyed after this time.
54. Where an recording is required to be held in excess of the retention period the executive committee will be responsible for authorising such a request, and recordings will be protected against loss or held separately from the surveillance system and will be retained for 6 months following date of last action and then disposed of as per 53 above
55. Recordings held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidentiary purposes will be deleted.
56. Access to retained CCTV recordings are restricted to officers and other persons as required and as authorised by general committee.

Complaints Procedure

57. Complaints concerning SBCI CC use of its CCTV system or the disclosure of CCTV recordings should be made to the secretary in writing details available on club website.
58. When requested, anonymised information concerning complaints will be provided to the Surveillance Commissioner.

Review Procedure

59. There will be an annual review of the Policy and use of the CCTV system to ensure it remains necessary, proportionate and effective in meeting the stated purposes.
60. As part of the review of SBCI cc will assess:
 - Whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation.
 - The monitoring operation, e.g. if 24 monitoring in all camera locations is necessary or whether there is a case for reducing monitoring hours;
 - Whether there are alternative and less intrusive methods for achieve the stated purposes.

Responsibilities

61. The general committee is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
62. The general committee is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
63. A club executive committee is responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.

Approval and review

Approved by	SBCI - Committee
Policy owner	SBCI - Committee
Policy author	SBCI - Committee
Date	27/06/2023
Review date	Annually

Revision history

Version no.	Revision date	Previous revision date	Summary of changes
0.0	15/06/2023	M.Wood	
0.1	25/06/2023	P.Collins	Review of draft policy and relevant amends made

Appendix 1 – CCTV Template Signage

