



# CCTV POLICY

## 1 INSTALLING A SYSTEM

### 1.1 Data Protection Impact Assessment

We have identified and documented the potential impact on the following individuals' privacy and taken this into account when installing and operating our CCTV system which comprises two external and three internal cameras:

- Tennis players: our external cameras do not overlook the tennis club's courts, clubhouse or grounds.
- Neighbours: our external cameras do not overlook our neighbours' gardens or houses.
- Staff, contractors, event organisers and members: our internal cameras do not overlook our kitchen, committee room, cellar or greenkeeper's shed.
- Bowlers: our internal cameras do not overlook our locker room or coaching shed.
- Customers: our internal cameras do not overlook our toilets.

In addition, our cameras are fixed and do not record sound; access to our system is password-protected and restricted to our Data Controller (DC) Ross Hunter; and we will review on an annual basis whether CCTV is our best security solution.

### 1.2 Registration

We registered with and paid the data protection fee of £35 to the Information Commissioner's Office (ICO) on 16 November 2021.

This will be renewed annually for as long as we consider that CCTV is our best security solution.

Our ICO reference number is ZB267144.

## **MANAGEMENT**

### **2.1 Governance**

Our purpose for using CCTV is to comply with the five licensing objectives of the Licensing (Scotland) Act 2005:

- Preventing crime and disorder
- Securing public safety
- Preventing public nuisance
- Protecting and improving public health
- Protecting children from harm

Access to the system is password-protected and managed by our DC.

### **2.2 Request for Personal Data**

We will comply with any legitimate requests from staff, contractors, event organisers, members, bowlers and customers for copies of footage and will seek prompt advice from the ICO where there is uncertainty.

Requests can be made via our CCTV Request Form which can be solicited from our secretary or downloaded from the Contact page of our website.

Completed forms must be submitted to our DC (c/o Laurieston Bowling Club, Polmont Road, Laurieston, Falkirk, FK2 9QT) and will be recorded and discussed at committee.

Footage will be provided within one month of receipt of request.

The only third parties we will provide footage to will be law enforcement bodies to assist them in the detection and prevention of a crime.

### **2.3 Training**

Our DC has been trained by our CCTV contractor Komtec Services in how to operate our system and is familiar with:

- Reviewing and extracting footage
- Procedures for recognising and dealing with requests for personal data
- Disciplinary penalties and legal repercussions for misuse of footage

## **3 OPERATION**

### **3.1 Retention**

We only retain recorded footage long enough to allow for an incident to come to light and be investigated.

Our retention period is seven days. Thereafter, footage is automatically deleted.

### **3.2 Data Quality**

We have ensured that our system produces high quality, clear images of five megapixels which are of a sufficient standard for law enforcement bodies to investigate crime.

We perform weekly checks to ensure our system continues to produce high quality, clear images.

### **3.3 Data Security**

Our system is password-protected.

Password details and operational instructions are stored in a locked cupboard in a locked room.

Viewing and copying of footage is restricted to our DC.

Software updates will be applied in a timely manner.

Support is provided by Komtec Services.

## **4 PUBLIC AWARENESS AND SIGNAGE**

### **4.1 Fair Processing**

We have displayed several highly visible, outward-facing signs on our windows to show that CCTV is in operation including:

- A4 signs by our main entrance and fire doors
- Smaller signs featuring the name and number of Komtec Services

We have also detailed the use of CCTV and its purpose, and included a clickable link to this document, on the Contact page of our website.