

## **INTRODUCTION**

Twickenham Yacht Club uses IP based security cameras to protect both the club's and members' property and as a deterrent against anti-social behaviour.

This policy sets out the use and management of the camera equipment and images in compliance with the Data Protection Act and the Information Commissioner's Office CCTV Code of Practice.

The cameras are capable of streaming live images from their view of the lower dinghy park (LDP) and pontoons and record bursts of video when activated by motion.

## **PURPOSES OF CCTV**

The purposes of the Club installing and using cameras includes:

- assist in the prevention or detection of crime or damage to equipment
- assist in the identification and prosecution of offenders
- monitor the security of the Club's premises

## **LOCATION OF CAMERAS**

One camera is located at the far end of the LDP next to the race hut and provides a view of the lower dinghy park for its full length. Another is installed on the clubhouse balcony with a view over the pontoons. No cameras are located in changing areas, toilets or other areas where privacy may be expected and there is no view inside the race hut.

## **RECORDING AND RETENTION OF IMAGES**

The cameras are able to provide a live stream 24/7 but only record for short bursts when activated by motion. Footage is stored via the Reolink App and is only checked by authorised Committee members when an issue arises such as missing or damaged equipment or signs of criminal activity. Material from the cameras will not be distributed to club members or beyond the club and will not be used for any other purposes other than maintaining club security. Images will only be released if being used by the police, and with their written authority, when investigating a crime. Viewing of downloads by the police must be recorded in writing. 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 image remains the property of the Club, and both the image and information 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.

## **ACCESS TO AND DISCLOSURE OF IMAGES**

Access to, and disclosure of, images recorded on camera is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded on a secure app. Access to recorded images is restricted to those Committee Officers who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a private area to which other members will not have access when viewing is occurring. If media on which images are recorded are removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- the police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness
- prosecution agencies, such as the Crown Prosecution Service
- relevant legal representatives
- individuals whose images have been recorded and retained and make a valid SAR

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded. A formal request in writing must be made to the Commodore.

## **INDIVIDUALS' ACCESS RIGHTS**

Under the Data Protection Act, individuals have the right on request to receive a copy of the personal data that the Club holds about them, including images if they are recognisable from the image.

If you wish to access any of your images, you must make a written request to the Commodore at [commodore.tyc@hotmail.com](mailto:commodore.tyc@hotmail.com), including the club's ICO contact Matthew Unwin at [unwinmh@gmail.com](mailto:unwinmh@gmail.com). Your request must include the date and time when the images were recorded, so that the images can be located and your identity can be established as the person in the images.

## **COMPLAINTS**

Any complaints about the club's security system should be addressed to the Committee and will be dealt with in accordance with the ICO Code of Practice.