



Skewen FC CCTV Policy

Introduction

1.1.1 A Closed Circuit Television (CCTV) system is in operation at Skewen FC/CC. This system, known as the 'Skewen FC/CC CCTV', comprises a number of cameras installed at strategic locations. All cameras are fixed. Images from all cameras are presented, monitored and recorded in the main Skewen FC/CC clubhouse in a suitably secure manner, to which access is restricted.

1.1.2 For the purposes of this document, 'the owner' of the system is Skewen FC/CC

1.1.3 For the purposes of the Data Protection Act the 'data controller' is Skewen FC/CC

1.2 Statement in respect of the Human Rights Act 1998

1.2.1 Skewen FC recognizes that public authorities carrying out the functions of a public service nature are required to observe the obligations imposed by the Human Rights Act 1998, and consider that the use of CCTV to be a suitable tool to improve safety and to assist in the management of site vandalism.

1.3 Objectives of the System

1.3.1 The objectives of Skewen FC/CC CCTV System are:-

- *to support safeguarding*
- *to help deter anti-social behavior*
- *to assist in supporting civil proceedings .*

Statement of purpose and principles

2.1 Purpose

2.1.1 The purpose of this document is to state the intention of the owners and the managers and to support the objectives of Skewen FC/CC CCTV System (hereinafter referred to as the “CCTV System”).

2.1.2 The ‘Purpose’ of the CCTV System and the process adopted in determining the ‘Reasons’ for implementing the CCTV System are as previously defined in order to achieve the objectives detailed within Section 1.

General Principles of Operation

2.2.1 The CCTV System will be operated in accordance with all the requirements and the principles of the Human Rights Act 1998.

2.2.2 The CCTV System will be operated in accordance with the Data Protection Act 1998 at all times.

2.2.3 The CCTV System will be operated fairly, within the law, and only for the purposes for which it was established and are identified within, or which are subsequently agreed, in accordance with this Code.

2.2.4 The public interest in the operation of the CCTV System will be recognised by ensuring the security and integrity of operational procedures.

2.2.5 Throughout this Code it is intended, as far as reasonably possible, to balance the objectives of the CCTV System with the need to safeguard the individual’s rights. Every effort has been made throughout the Code to indicate that a formal structure has been put in place, including a complaints procedure, by which it can be identified that the CCTV System is not only accountable, but is seen to be accountable.

Copyright

2.3.1 Copyright and ownership of all material recorded by virtue of the CCTV System will remain with the data controller.

2.6 Processing and Handling of Recorded Material

2.6.1 All recorded material, will be processed and handled strictly in accordance with this Code.

2.7 Equipment Operating Instructions

2.7.1 Technical instructions on the use of equipment housed within the main offices are contained in a separate manual provided by the equipment suppliers.

Privacy and data protection

3.1 Personal Data

3.1.1 All personal data obtained by virtue of the CCTV System, shall be processed fairly and lawfully and, in particular, shall only be processed in the exercise of achieving the stated objectives of the system. In processing personal data there will be total respect for everyone's right to respect for his or her private and family life and their home.

3.1.2 The storage and security of the data will be in accordance with the requirements of the Data Protection Act 1998.

3.2 Data Protection Legislation

3.2.1 All data will be processed in accordance with the principles of the Data Protection Act, 1998 which, in summarized form, includes, but is not limited to:

All personal data will be obtained and processed fairly and lawfully.

Personal data will be held only for the purposes specified.

Personal data will be used only for the purposes, and disclosed only to the people, shown within this Code.

Only personal data will be held which are adequate, relevant and not excessive in relation to the purpose for which the data are held.

Steps will be taken to ensure that personal data are accurate and kept up to date.

Personal data will be held for no longer than is necessary.

Individuals will be allowed access to personal data held about them and, where appropriate, permitted to correct or erase it.

Security measures will be implemented to prevent unauthorized or accidental access to, or alteration, disclosure, loss or destruction of, personal data.

3.3 Access by Data Subjects (Subject Access Requests)

3.3.1 Individuals are entitled to access images of themselves recorded on the CCTV System. Any individual making a request for such access should be provided with the following information:

- (a) The type of images recorded;*
- (b) The purpose for which those images were recorded; and*

3.3.2 A Subject Access Request form should also be provided to the individual for them to complete. This form will:

Indicate any information required in order to locate the requested images;

Indicate any information required to identify the person making the request;

state the fee, if any, which Skewen FC/CC charges for carrying out this request (which can be up to a maximum of £10); and

offer the individual the opportunity to view the recorded images at Skewen FC/CC premises.

Any request from an individual for the disclosure of personal data which he/she believes is recorded by virtue of the CCTV System will be directed in the first instance.

The principles of Sections 7 and 8 of the Data Protection Act 1998 shall be followed by Skewen FC/CC in dealing with any requests received.

Any person making a Subject Access Request must be able to satisfactorily prove their identity to the committee and also provide sufficient information to enable the data to be located.

If a recording is precluded from disclosure under a subject access request because the images of third parties are visible on the recording, the images of these third parties must be disguised or blurred. If the CCTV System does not have the facility to carry out such editing, a written contract should be made with an editing company.

3.3.7 Any written contract entered into with an editing company should include the following:

A description of all the tasks to be carried out by the editing company;

An obligation upon the editing company to act only in accordance with the instructions of Skewen FC/CC;

The steps to be taken by the editing company to ensure the reliability of its coaches/staff/volunteers who have access to the recorded images;

The technical and organizational security measures to be taken by the editing company in order to safeguard the recorded images against unauthorized or unlawful processing and against accidental loss, destruction or damage;

An obligation by the editing company to allow Skewen FC/CC to audit the editing company's systems to ensure the security of the recorded images is maintained.

3.3.8 If the images of any third parties cannot be disguised or blurred, Skewen FC/CC shall try to seek the consent of those third parties to disclosure of their images. If it is not possible to obtain such consent or consent is denied, Skewen FC/CC shall nevertheless consider whether it is reasonable in all the circumstances to make the disclosure in accordance with the requirements of any legislation and/or any guidance issued by the Information Commissioner.

3.3.9 A record will be maintained by the Headteacher of all subject access requests received in respect to the CCTV System. This record will include the identity of the person making the request, the date it was made and the action taken in response.

Accountability and public information

4.1 Privacy of Private Residential Property

4.1.1 Cameras will not be used to look into private residential property.

4.2 Complaints

4.2.1 *A member of the public wishing to register a complaint with regard to any aspect of the CCTV System may do so by contacting Skewen FC/CC. All complaints shall be dealt with in accordance with Skewen FC/CC complaints procedure, a copy of which may be obtained from Skewen FC/CC.*

4.3 Public Information

4.3.1 *Signs: Signs will be placed in the locality of the CCTV cameras indicating the following:*

The presence of CCTV monitoring.