



## CCTV Policy

Guidance for the operation of CCTV

<b>Responsible for review of procedures</b>
Information Systems Manager

<b>Change History</b>			
<b>Version</b>	<b>Approved by</b>	<b>Date of approval</b>	<b>Next review date</b>
Proc-14-01	Information Systems Manager	January 2016	January 2017

## 1 Principles

The CCTV equipment and the images recorded by it are controlled by the Chief Executive, who is responsible for how the system is used and for notifying the Information Commissioner about the CCTV system and its purpose.

The Archery GB Board has considered the need for a CCTV system and its appropriate uses. It has decided that such a system is required for the prevention of and the detection of crime and for protecting the safety of customers and staff.

The Archery GB Board will review our CCTV usage annually to make sure that the requirements are still valid and appropriate.

*As Information Controller*, the Chief Executive is aware that notification to the Information Commissioner is necessary and that this notification must be renewed annually. Notification has been submitted to the Information Commissioner.

Cameras have been placed as far as possible to ensure that their images are clear enough to allow the police to use them to investigate a crime. All cameras have been sited where possible to avoid capturing images of persons not visiting the site.

Signs are displayed in prominent locations advising that a CCTV system is in operation, with contact details for this location. The size of signs is in each case, considered appropriate for the location.

Recorded images are securely stored in each location and images are retained for up to 31 days after being captured, except in cases where a potential incident has come to light that requires further investigation. The images will be retained for no more than 31 days after the investigation into an incident is closed.

Recordings will only be made available to law enforcement agencies involved in the prevention or detection of crime upon written request and to no other party.

The operating equipment is checked quarterly to ensure that it is fully functional and to ensure the quality of the recording media, the accuracy of camera positioning, the correct setting of time and date recording and any other necessary remedial work.

Individuals contacting Archery GB for access to images relating to themselves will be dealt with without unnecessary delay and recorded images that are available (i.e. less than 31 days old) may be made available subject to payment of an Administration fee and the submission of appropriate reasons why the individual requires access. This access is recognised not to be an automatic right and Archery GB will request advice from the Information Commissioner where necessary.

## 2 Site Management

Each site fitted with a digital CCTV or VHS CCTV system should appoint an individual responsible for overseeing CCTV operations. Under normal circumstances this will be the Information Systems Manager.

This CCTV Policy is to be issued to all people deemed nominated persons. Each nominated person must acknowledge receipt on the site *CCTV2 Nominated Users Log* (see below).

The Chief Executive should ensure that sufficient nominated users are appointed to enable them to respond to incidents or requests for information. Further consideration should be given to the need to respond quickly when key nominated users are on leave or otherwise absent. Nominated users are to be relied upon to consider the data protection implications of image processing with particular reference to the prevention of processing likely to cause substantial and unwarranted damage to the individual concerned or any other persons whose images may be captured. No one other than nominated users may have access to the CCTV equipment and images.

## 3 Site Signage

We are obliged to make members of the public aware where we have CCTV recording in progress on our sites. These signs follow a standard template explaining why we have cameras and who is responsible for the systems. Signage should also be displayed for any non-digital VHS tape-based systems.

The basic rules are:

- For outside cameras monitoring the slip roads or car parks, you must display signage in the car parks and approaches.
- For internal systems anywhere in the building you must display door and foyer signs.

## 4 Site Maintenance

The CCTV system must be cleaned and maintained regularly to ensure satisfactory operation.

Any breakdown in operation should be minimised by logging a maintenance call. The Information Controller may temporarily withdraw a system or part of a system. During maintenance, equipment will be switched off acting only as “dummy” camera deterrent.

Sites should verify the accuracy of time/date displayed the system on a weekly basis and any abnormality which cannot be corrected should be notified as a maintenance issue.

Each camera should also be checked on a quarterly basis to ensure that none have been disabled or otherwise compromised. Quarterly inspections should be recorded on the form *CCTV6: Maintenance Log* (see below). Things to check weekly are:

- Are all the cameras recording clear images?
- Are the cameras all pointing where their labelled descriptions say?
- Is the system date and time correct?
- Is recording set correctly – playback and check?
- Is the list of nominated users up to date?
- Have unwanted images been erased (older than 31 days)?
- Is there foliage or any obstruction in the way of external cameras?
- Are any cameras pointing off site?

## 5 Security of Images

All images (whether digital or VHS tap) should be stored in a lockable area with access allowed only to authorised persons as agreed by the Chief Executive and listed on the Responsible Persons Log.

Access to the digital CCTV management system should be password protected. The passwords should only be known by those persons documented in the Responsible Persons Log. Passwords should be changed quarterly to maintain security.

Those with access to the lockable area should be designated as nominated users.

The digital system has been set up to automatically erase all images within 31 days of recording (max). The only images not erased will therefore be those retained on a CD or archived to hard disk in readiness for burning to CD. Any CD recording for any reason should be logged.

It is the Chief Executive's responsibility to make sure that any images saved to hard disk on the digital recorder are reviewed monthly and any footage previously burned to disk or no longer required as part of an on-going investigation is erased.

The Chief Executive will determine and record the names of those individuals who are authorised to access CCTV images.

Access to images will only be permitted for the reasons stated in this Code of Practice. The Chief Executive is responsible for ensuring that authorised staff are aware of the permitted reasons and all other user responsibilities including access requests held within the Code of Practice

## 6 Access Requests from Individuals

It is a right, under section 7 of the 1998 Data Protection Act for individuals to request copies of any images that we might hold of them. This applies to our staff as well as members of the general public.

Individuals contacting Archery GB for access to images relating to themselves should be informed of the web location of the CCTV Policy which includes the form called "Archery GB CCTV – Customer Information and Access Request" at the end.

We ask individuals to provide us with a £10 administration fee for this service. We do have the legitimate right to refuse to comply if they do not provide us with sufficient detail to locate their images and identify them. You can also refuse if you feel the grounds to be unreasonable, but before doing so, you should contact the Information Systems Manager on 01952 677 888 for clarification.

All requests must be made in writing using the form at the end of this policy and sent to the Information Services Manager. All requests and their outcome should be documented in the form *CCTV 5: Site log of Images Issued to Individuals* (see below) and retained on site for 12 months.

The Information Systems Manager should respond to the person making the request within 40 days. In cases of refusal to process images, a person may, within 21 days of receiving a

## CCTV Policy

notification, request a data controller to reconsider or to take a decision on a new basis. There are then 21 days to respond to the request.

If no image of the requesting person can be located, this should be explained to the person within 40 days.

If you can identify the relevant footage you should burn it to CD. If this is not possible, then you should provide a series of still image printouts. It should be noted though that we are only permitted to send recorded images of the person making the data request. Under certain circumstances, we are obliged to blur out or obscure the images of any other customers caught in the frame, but this is only where the privacy of those individuals has been intruded. Since most of our cameras monitor public access areas, it is highly unlikely that privacy will be an issue, but if you are in any doubt, please contact the Information Systems Manager for advice.

### **7 Disclosures - Access Requests from Third Parties**

Access requests from any other third party will only be permitted in accordance with this Code of Practice. Images must not be made available to any other 3rd parties or the media or published on the internet.

Any request should be made in writing and will be documented on the *CCTV3 form* (see below). While it will be normal to grant access to law enforcement agencies involved in the prevention or detection of crime, such access should only be granted upon receipt of a written request with an accompanying crime number.

Image requests may only be made to the Chief Executive or the Information Systems Manager will be responsible for ensuring that a properly requested image is located. The Information Systems Manager will also consider whether other individuals on the extract should be blurred, disguised or not disclosed. Properly requested images will be provided within 40 days of a written request. If no image of the requesting person can be located, this should be explained to the person within 40 days.

On rare occasions, the police or Security Services have requested the removal of entire hard drives from the digital video recorders. There are obvious cost implications with this as an engineer will be required to visit site to replace the drives. The action Archery GB takes will depend on the circumstances therefore such requests should be escalated immediately to the Chief Executive.

Requests by members of the general public for images relating to incidents should be referred to the Information Systems Manager who will consider whether the request is genuine and whether there is any risk to the safety of others involved before releasing the footage or stills.

The date and reason for all disclosures should be recorded on the form *CCTV3* (see below).

## 8 Archery GB CCTV Logs

A total of 5 logs are maintained as part of the Archery GB CCTV system as follows:

### 8.1 CCTV 1: Responsible Persons Log

This is a one-liner for each site to be retained centrally by the Information Systems Manager. It is a simple confirmation of who is nominated to be responsible for the system on site.

#### Archery GB - CCTV 1

##### RESPONSIBLE PERSONS LOG

Date	Site	Name	Position

### 8.2 CCTV 2: Nominated Users Log

This is a site-specific document listing all site users nominated by the Information Systems Manager and confirming the date of issue of the Archery GB Code of Practice. Only those persons listed are to have access to the CCTV system.

Archery GB - CCTV 2			
NOMINATED USERS LOG			
Date	Name	Position Held	CCTV Policy Issued

### 8.3 CCTV 3: Site Log of Images Issued to Third Parties (Disclosures)

This is a site-specific document detailing every request made by the Police and Law Enforcement Agencies for CCTV images. It should detail agreement or refusal with reasons and comments. Records are to be retained on-site for 12 months.

Archery GB – CCTV 3				
SITE LOG OF IMAGES ISSUED TO THIRD PARTIES				
Date of Request	Requested By	Agreed Yes / No	Date Supplied / reason refused	Comments / Crime Number

### 8.4 CCTV 4: Site Log of Images Recorded

This is a site-specific document detailing every time that an image is actually recorded to a specific CD or tape and the reason for the recording. This log should have a 12 month record available to site.

Archery GB - CCTV 4			
LOG OF IMAGES RECORDED TO TAPE OR CD			
Date	Time	Location	Reason For Recording

### 8.5 CCTV 5: Site log of Images Issued to Individuals

This is a site-specific document detailing every request made by individuals for CCTV images of themselves. It should detail agreement or refusal with reasons and comments. Records are to be retained on-site for 12 months.

#### Archery GB - CCTV 5

##### SITE LOG OF IMAGES ISSUED TO INDIVIDUALS

Date of Request	Requested by	Agreed Yes/ No	Date supplied / reason refused	Comments

### 8.6 CCTV 6: Site log of System Maintenance

This is a site-specific document detailing every quarterly system inspection, service visit or maintenance call out. Records are to be retained on-site for 12 months.

Date	Name	Site	Sys Location	Repairs carried out

## 9 Contacts for Queries

If you have any questions or comments regarding this manual please contact the Information Systems Manager on Mobile: 07500 554002 or log maintenance issues with him at [itsupport@archerygb.org](mailto:itsupport@archerygb.org)

## 10 How does Archery GB control its CCTV Images?

Archery GB complies with the 1998 Data Protection Act and the subsequent guidelines published by the Information Commissioner in July 2000 and January 2008. Archery GB has detailed management guidelines, procedures and policy which ensures that compliance is adhered to. More information about the guidelines within which CCTV should be operated is available at [www.ico.gov.uk](http://www.ico.gov.uk)

### Can I get access to the images that Archery GB might hold of me?

It is a right, under section 7 of the 1998 Data Protection Act for individuals to request copies of any images that we might hold of them, but it is the individual's responsibility to provide Archery GB with necessary details of when and where they visited our premises in order to do this. Archery GB reserves the right to refuse to comply with a request that is either unreasonable or which is not accompanied by sufficient detail to allow Archery GB to identify the individual. If a request is refused, Archery GB will notify you within 21 days giving you the reasons why your request has been denied. Properly requested images will be provided within 40 days of a written request. If no image of the requesting person can be located, this will be explained to the individual within 40 days. Archery GB requests the right to charge a £10 administration fee for each request. It may be necessary to obscure images of other people also shown on any requested footage, and Archery GB reserves the right to ask individuals to meet any costs incurred in doing this too.

## CCTV Policy

Please note that, in line with government guidelines Archery GB only retains CCTV images for a maximum of 31 days.

If you would like Archery GB to provide you with any CCTV images held of you, please complete the form below and return to the Chief Executive's Office at Archery GB. Archery GB will post to you either black & white still shots, VHS video or a CD ROM containing the footage (whichever is appropriate to the system at the location concerned). This will be posted to the address on the request form.

### **CCTV Customer Data Access Request Form**

Your Name: \_\_\_\_\_

Your Address: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

Postcode: \_\_\_\_\_

Day Time

Contact Number: \_\_\_\_\_

Date of this Request: \_\_\_\_\_

Which site did you visit? \_\_\_\_\_

What date did you visit the site? \* \_\_\_\_\_

What time did you arrive on site? \_\_\_\_\_

What time did you leave site? \_\_\_\_\_

Please describe what you were wearing that day \_\_\_\_\_

Reason for the request: \_\_\_\_\_

**Please provide a passport sized photo so that we can identify you and attach a cheque for £10 made payable to Archery GB.**

**Please return to:**

**Archery GB**

**Chief Executive**

**Archery GB**

**Lilleshall National Sports and Conferencing Centre**

**Newport**

**Shropshire TF10 9AT**

\* Please note that Archery GB only retains CCTV images for a maximum of 31 days



Archery GB is the trading name of the Grand National Archery Society, a company limited by guarantee no. 1342150 Registered in England.