



Guernsey Rovers AC

CCTV Policy @ 24th July 2024



1. Policy Statement

1.1 Guernsey Rovers AC uses 24 hour Close Circuit Television (“CCTV”) on the premises.

The purpose of this policy is to set out the position of Guernsey Rovers AC as to the management, operation and use of the CCTV.

1.2 This policy applies to all members, staff and visitors to Guernsey Rovers AC and its surrounding area and all other persons whose images may be captured by the CCTV system.

1.3 This policy takes account of all applicable legislation and guidance, including:

1.3.1 The Data Protection (Bailiwick of Guernsey) Law, 2017

1.3.2 General Data Protection Regulation (“GDPR”)

1.3.3 CCTV guidance issued by The Office of the Data Protection Authority (ODPA)

2. Purpose of CCTV

2.1 Guernsey Rovers AC will use CCTV for the following purposes:

2.1.1 To provide a safe and secure environment for all members, staff and visitors

2.1.2 To prevent the loss of or damage to Guernsey Rovers AC buildings and/or assets

2.1.3 To assist in the prevention of crime and assist law enforcement agencies in apprehending offenders

3. Description of system

3.1 Cameras are positioned both inside and outside of the building. The cameras have sound recording capabilities, those inside the building have this capability switched **OFF**.

On the recommendation of the installation engineer, the outside cameras have sound switched **ON** to pick up any potential conversation between persons trying to break into the clubhouse.

The cameras are linked back to a central Network Video Recorder(NVR).

4. Sighting of cameras

- 4.1 All CCTV cameras will be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to members, staff and visitors.
- 4.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. Guernsey Rovers AC will make all reasonable efforts to ensure that areas outside of the premises and grounds are not recorded.
- 4.3 Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.
- 4.4 Cameras will not be sited in any areas where members, staff or visitors have an expectation of privacy, such as changing rooms or toilets.
- 4.5 Cameras may be located in communal areas and, where this is the case, members, staff and visitors will be made aware. Access to the footage is restricted and will only be used to fulfil the purposes in 2.1.

5. Management and Access

- 5.1 The administration of the CCTV system will be managed by an appointed member of the Executive Committee.
- 5.2 Any allegations against members, staff or visitors will be referred to the Executive Committee and they will determine who needs to view the footage and the course of action necessary
- 5.3 The viewing of **live** CCTV images will be restricted to those designated by the Executive Committee to have a genuine need for access e.g. system administration, keyholders on call or anyone else considered to have a reason to access the CCTV in order to satisfy the purposes in 2.1.
- 5.4 Access to **recorded** images which are stored by the CCTV system is restricted to those the Executive Committee deem to have a genuine need for access. Relevant images may be shared with the Executive Committee allowing them to review incidents where disciplinary matters or complaints need to be addressed.
- 5.5 No other individual will have the right to view or access any CCTV images unless in accordance with the terms of this policy as to disclosure of images.
- 5.6 The CCTV system is checked daily to ensure that it is operating effectively

6. Storage and Retention of Images

- 6.1 Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.
- 6.2 Recorded images are stored on a overwriting looping disc, unless there is a specific purpose for which they are retained for a longer period.

- 6.3 Appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:
- 6.3.1 CCTV recording systems are located in restricted access areas
 - 6.3.2 Access to the CCTV storage system is UserID and password protected;
 - 6.3.3 The ability to make copies of recorded data is limited to specified individuals.
 - 6.3.4 A log of any access to recorded CCTV images, including time and dates of access, and a record of the individual accessing the images, will be maintained by Guernsey Rovers AC.

7. Disclosure of Images to Data Subjects

- 7.1 Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.
- 7.2 Any individual who requests access to images of themselves will be considered to have made a subject access request pursuant to the Data Protection Legislation.
- 7.3 When such a request is made the appropriate individual with access to the CCTV footage (ref 5.4) will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request.
- 7.3.1 If the footage contains only the individual making the request then the individual may be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request. The individual accessing the footage must take appropriate measures to ensure that the footage is restricted in this way.
 - 7.3.2 If the footage contains images of other individuals then the individual accessing the footage must consider whether:
 - The request requires the disclosure of the images of individuals other than the requester, for example whether the images can be distorted so as not to identify other individuals;
 - The other individuals in the footage have consented to the disclosure of the images, or their consent could be obtained; or
 - If not, then whether it is otherwise reasonable in the circumstances to disclose those images to the individual making the request.
- 7.4 A record will be kept, and held securely, of all disclosures which sets out:
- 7.4.1 When the request was made;
 - 7.4.2 The process followed by the individual with access to the CCTV footage in determining whether the images contained third parties;
 - 7.4.3 The considerations as to whether to allow access to those images;

- 7.4.4 When the individuals that were permitted viewed the images
 - 7.4.5 Whether a copy of the images was provided, and if so to whom, when and in what format.
- 7.5 Note that, when a subject access request is made then, unless an exemption applies (such as in relation to third party data that it would be unreasonable to disclose) then the requester is entitled to a copy in a permanent form. If an individual agrees to viewing the images only then a permanent copy does not need to be provided. However, if a permanent copy is requested then this should be provided unless to do so is not possible or would involve disproportionate effort.

8. Disclosure of Images to Third Parties

- 8.1 Guernsey Rovers AC will only disclose recorded CCTV images to third parties where it is permitted to do so in accordance with the Data Protection Legislation.
- 8.2 CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.
 - 8.2.1 If a request is received from a law enforcement agency for disclosure of CCTV images then the individual with access to the CCTV footage must follow the same process as above in relation to subject access requests.
 - 8.2.2 Detail should be obtained from the law enforcement agency as to exactly what they want the CCTV images for, and any particular individuals of concern. This will then enable proper consideration to be given to what should be disclosed, and the potential disclosure of any third party images.
 - 8.2.3 The information above must be recorded in relation to any disclosure.
- 8.3 If an order is granted by a Court for disclosure of CCTV images then this should be complied with. However very careful consideration must be given to exactly what the Court order requires. If there are any concerns as to disclosure then appropriate legal advice may be required.

9. Misuse of CCTV systems

- 9.1 The misuse of CCTV system could constitute a criminal offence.
- 9.2 Anyone who breaches this policy may be subject to disciplinary action.

10. Review of Policy and CCTV System

- 10.1 This policy will be reviewed every two years or earlier should the need arise.