

# RRCPC CCTV Policy

Last review: September 2025

Next review: September 2026

This policy should be read with reference to the Data Protection Act 1998, the Protection of Freedoms Act 2012 and the CCTV code of practice 2008 from the Information Commissioner's Office (ICO) available at <https://ico.org.uk/for-organisations/uk-gdpr-guidance-and-resources/cctv-and-video-surveillance/>.

In this policy the following terms are used:

- **Data Controller:** the individual responsible for the overall CCTV system and its data protection. This is the current Hut Warden.
- **CCTV Operators:** these are the committee members who have access to the CCTV system. This is the Hut Warden and the Hut Engineer.

## Background

Under the Protection of Freedoms Act 2012 the processing of personal data captured by CCTV systems (including images identifying individuals) is governed by the Data Protection Act and the Information Commissioner's Office (ICO) has issued a code of practice on compliance with legal obligations under that Act. The use of CCTV by organisations is covered by the Act, regardless of the number of cameras or how sophisticated the equipment is and RRCPC should adhere to the ICO's code of practice. During installation and operation of CCTV RRCPC should issue a privacy notice to members. It should inform members that CCTV will be in operation and about how RRCPC will use any personal information they collect. Access to personal information should be restricted only to a few persons who need particular information to prevent crime.

RRCPC can install CCTV only in public areas such as corridors or outside in the car parks

## Action plan

The RRCPC uses CCTV equipment to provide a safer, more secure environment for members and guests and to prevent vandalism and theft. Essentially it is used for:

- The prevention, investigation and detection of crime.
- The apprehension and prosecution of offenders (including use of images as evidence in criminal proceedings).
- Monitoring the security of the site.

The RRCPC does not use the CCTV system for covert monitoring.

## Location

Cameras are located in those areas where the RRCPC has identified a need and where other solutions are ineffective. The RRCPC CCTV system is used solely for purposes identified above and is not used to routinely monitor members or guests conduct.

## Maintenance

The CCTV system is maintained by the committee, including periodic inspections.

The controllers are responsible for:

- Ensuring the RRCPC complies with its responsibilities in relation to guidance on the location of the camera.
- Ensuring the date and time reference are accurate.
- Ensuring that suitable maintenance and servicing is undertaken to ensure that clear images are recorded.
- Ensuring that cameras are protected from vandalism and remain in working order.

## Identification

In areas where CCTV is used the RRCPC will ensure that there are prominent signs placed at both the entrance of the CCTV zone and within the controlled area.

The signs will:

- Be clearly visible and readable.
- Be an appropriate size depending on context.

## Type of equipment

The RRCPC standard CCTV cameras record visual images only and do not record sound.

## Administration

The *Data Controller* has responsibility for the control of images and deciding how the CCTV system is used. The RRCPC has notified the Information Commissioner's Office of both the name of the data controller and the purpose for which the images are used. All *CCTV Operators* with access to images are aware of the procedures that need to be followed when accessing the recorded images. All operators are trained in their responsibilities under the CCTV Code of Practice. Access to recorded images is restricted to committee that need to have access in order to achieve the purpose of using the equipment. All access to the medium on which the images are recorded is

documented. All users are aware of the restrictions in relation to access to, and disclosure of, recorded images.

## **Image storage, viewing and retention**

The recording unit is kept in a locked area only accessible to a limited number of people and is password protected to the *CCTV Operators*.

Recorded images will be stored in a way that ensures the integrity of the image and in a way that allows specific times and dates to be identified. Access to live images is restricted to the *CCTV Operators* unless the monitor displays a scene which is in plain sight from the monitored location. Recorded images can only be viewed in a restricted area by approved committee members. The recorded images are viewed only when there is suspected criminal activity and not for routine monitoring of members, committee or visitors unless the cameras are installed to monitor the safe movement of persons through a designated area e.g. corridors (these areas will be identifiable by clear signs).

The RRCPC reserves the right to use images captured on CCTV where there is activity that the RRCPC cannot be expected to ignore, such as criminal activity. Images retained for evidential purposes will be retained in a locked area accessible by the *Data Controller* only. Where images are retained, the *Data Controller* will ensure the reason for their retention is recorded, where it is kept, any use made of the images, and finally when it is destroyed.

Neither the Data Protection Act nor the Information and Records Management Society prescribe any specific minimum or maximum periods which apply to CCTV recorded images. The RRCPC ensures that images are not retained for longer than a month, after which the images are removed or erased.

## **Disclosure**

Disclosure of the recorded images to third parties can only be authorised by the *Data Controller*. Disclosure will only be granted:

- If its release is fair to the individuals concerned.
- If there is an overriding legal obligation (e.g. information access rights).
- If it is consistent with the purpose for which the system was established.

All requests for access or for disclosure are recorded. If access or disclosure is denied, the reason is documented. Disclosure may be authorised to law enforcement agencies, even if a system was not established to prevent or detect crime, if withholding it would prejudice the prevention or detection of crime.

## **Subject access requests**

Individuals whose images are recorded have a right to view images of themselves and to be provided with a copy of the images. If the RRCPC receives a request under the Data Protection Act it will comply with requests within 40 calendar days of receiving the request.

The RRCPC may charge a fee for the provision of a copy of the images. If the RRCPC receives a request under the Freedom of Information Act it will comply with requests within 20 working days of receiving the request. As a general rule, if the viewer can identify any person other than, or in addition to, the person requesting access, it will be deemed personal data and its disclosure is unlikely as a Freedom of Information request. Those requesting access must provide enough detail to allow the operator to identify that they are the subject of the images, and for the operator to locate the images on the system. Requests for access should be addressed to the data controller.

Refusal to disclose images may be appropriate where its release is:

- Likely to cause substantial and unwarranted damage to that individual.
- To prevent automated decisions from being taken in relation to that individual.

## **Policy review**

This CCTV policy is reviewed in full annually by the committee, including assessing whether the use of CCTV continues to be justified.

If the RRCPC decides to change the way in which it uses CCTV, it will inform the Information Commissioner within 28 days.

The review dates are at the top of this document.