



**Three Mile Cross Bowling Club**  
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## **Policy on the use of Closed Circuit Television (CCTV) Surveillance**

### **1. Introduction**

The club has a Privacy Policy towards ensuring that it complies with General Data Protection Regulations. It includes reference to the use of CCTV towards safeguarding its car park, premises and the interests of its members and visitors in the prevention of crime. Where necessary, it will be used for the investigation of incidents on the club's premises (e.g. to assist law enforcement personnel).

This Policy is specific to the management, operation and use of CCTV at the club. It takes account of the UK General Data Protection Regulations, the Data Protection Act 2018 and other relevant statutory obligations. It defines the use and purpose of CCTV, management of the system, storage/retention of film and disclosure of images.

This Policy applies to all members of the club, visitors to the club and any other persons whose images may be captured by the CCTV operation.

The responsibility of maintaining this Policy is that of the club's Management Committee.

### **2. Use and Purpose of CCTV at the Club**

The club has three cameras permanently in use (none of which have sound recording capabilities). All cameras are sited on the clubhouse. One is directed towards the lane approaching the club, one is at the entrance to the clubhouse and the other is directed towards the car park and bowling green. There is visible signage on the walls of the clubhouse, at the entrance and towards the back door, showing that CCTV is in operation.

The purpose of the CCTV surveillance is to protect the interests and safety of the club's members and their property, its premises and land.

### **3. Storage and Retention of CCTV Film**

Recorded images are on a loop system. They are routinely retained for a period of 15 days before being deleted by being recorded over.

Where there is a specific and legitimate purpose to retain images beyond this period (e.g. for use by the club for evidential, insurance, disciplinary, legal or emergency service purposes), relevant footage may be extracted and retained for as long as necessary to fulfil that purpose. Any decision to retain footage beyond the standard retention period will be authorised by the Chair of the Management Committee and recorded. Retained images will be extracted onto a USB storage device which will be password-protected and stored securely in a locked cabinet or safe. Access to retained images will be restricted to individuals involved in the investigation. All images retained by the club will be destroyed once the investigations or any related proceedings are concluded.

#### **4. Management and Access**

The recording equipment is held in a storeroom behind the bar. The door to the bar area has its own lock and key. The storeroom is not readily accessed by the vast majority of the club's members, visitors and the general public.

Day to day management of the system is the responsibility of an individual member known as the System Manager. The System Manager is appointed by the Management Committee.

The recording equipment is password protected. The password is only known by the System Manager and a limited number of the Management Committee members.

If access to any images is required, then a log shall be maintained of the time and reason for it being necessary.

#### **5. Disclosure of Images to Data Subjects**

Under current Data Protection legislation, anyone recorded on the CCTV system is known as a Data Subject. He/she can at any time request access to the system in order to see images relating to themselves. This is called a Subject Access Request.

Any such request must be made to the Secretary or, if unavailable, Chairman of the Management Committee - bearing in mind the need to do this within the 15-day cycle.

In the first instance, the System Manager will review any footage, in respect of relevant time periods, in accordance with the request.

If the footage only contains the individual making the request, then the individual may be permitted to view the footage. If the footage contains

images of other individuals, then the Management Committee must consider whether 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.

The Committee shall ensure that a record is maintained of the date of request, the considerations as to whether to allow access to those images, the individuals that were permitted to view the images and date of disclosure and a description of the relevant circumstances.

## **6. Disclosure of Images to Third Parties**

No images will be disclosed to third parties unless done so in accordance with current Data Protection legislation.

The occasions on which images may be disclosed (in addition to that described in the preceding paragraph) is when requested by emergency services in the discharging of their duties.

If such a need arises then the club must follow the same reporting procedures as those relating to Data Subjects.

## **7. Policy Review**

The Management Committee shall review this policy annually, or sooner if there is a change in legislation or an operational issue arises that necessitates immediate attention.