



BACUP GOLF CLUB LTD CCTV POLICY

POLICY STATEMENT

Bacup Golf Club is fully committed to the safety of its members, employees and visitors and uses CCTV to help maintain a safe and secure environment. Recorded images are personal data, which must be processed in accordance with data protection laws.

This policy sets out Bacup Golf Club's approach to the use of CCTV in the Clubhouse and Car Park and its effect on employees, members and visitors.

In accordance with the Information Commissioner's Office (ICO), Bacup Golf Club has registered as a user of CCTV for the purposes defined in this policy.

PURPOSE AND SCOPE

Bacup Golf Club operates CCTV cameras around the premises under the guidelines of the Data Protection Act 2018 (DPA 2018) and the General Data Protections Regulations (GDPR) as they apply in the UK.

The primary use of the CCTV cameras in the Clubhouse and Car Park is for the purpose of detecting and preventing crime, protecting the property and facilities, and for personal security of members, visitors and employees whilst at Bacup Golf Club. It is not the intention of the Club to use CCTV for monitoring the work of employees or finding out whether or not they are complying with the Club's policies and procedures.

PRINCIPLES

The following principles have been applied:

- CCTV has been installed only where it is considered necessary and proportionate.
- The Club has ensured that all cameras are set up in a way that ensures that there is minimal intrusion of privacy, and that any intrusion is fully justified.
- Signs are displayed prominently to inform employees, members and other individuals that CCTV is in use.
- No images and information will be stored beyond those which are strictly required for the stated purpose of a surveillance camera system.
- Access to retained images and information will be restricted, with clearly defined rules on who can gain access and appropriate security measures to prevent unauthorised use.
- It is not the intention that CCTV in the Clubhouse and Car Park will be used to monitor the quality and amount of work completed by an employee.

GENERAL PROCEDURES

- The Data Controller is Bacup Golf Club Ltd, through Council, its management body.
- Day to day responsibility for ensuring this policy is appropriately managed and controlled lies with Secretary, who is the Data Protection Officer.
- The Data Processor, who handles personal data on behalf of the Club, is the Treasurer.
- Live CCTV footage can only be viewed by the Secretary and the Treasurer.

- Recorded CCTV footage can only be reviewed by the Secretary and the Treasurer and, as necessary, the Police under the supervision of the Secretary or the Treasurer. Camera surveillance will be maintained at all times and footage continuously recorded and held on system memory for a period of up to 30 days.

CLUB EMPLOYEES

- As stated, the primary purpose of CCTV is to protect the property, members, visitors and employees at Bacup Golf Club. However, we recognise that when CCTV is installed in a workplace, it is likely to capture pictures of employees and workers, even if they are not the main subject of surveillance.
- CCTV evidence may be used as part of an employee investigation where, in the reasonable belief of the Club, there may have been serious or gross misconduct committed. In such cases the footage must be requested by Council. In the case of a worker (non-Club employee) any evidence identified may be passed to their employer.
- In accordance with the CCTV Code of Practice, where footage is used in disciplinary proceedings, the footage will be retained and the employee or worker allowed to see and respond to the images.

REQUESTS FOR ACCESS TO CCTV FOOTAGE

- Any requests for access to CCTV footage need to be relative to the purpose of the CCTV system: detecting and preventing crime, protecting the property and facilities, and for personal security of members, visitors and employees whilst at Bacup Golf Club.
- A record will be maintained of any requests made and whether the request has been approved or not.
- The Police, other enforcing agents, or outside bodies may request access to a recording. Any request will be considered initially by the Secretary, referring to Council if appropriate.
- Employees, members and visitors whose images are recorded have a right to view those images of themselves and to be provided with a copy of the images within 30 days of their request, as long as they have not been automatically deleted. No charge will be made for supplying any such images.
- Any person making such a request should write to the Secretary providing the relevant time and date of the image, so that they may be easily identifiable.

Complaints about the operation of the CCTV system should be addressed initially to the Secretary.

June 2024

