

# **CCTV Policy**

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#### 1. Introduction

Premier Pitch is fully committed to operating a safe environment, it therefore has in place a closed circuit television ("CCTV") system to assist in providing a safe and secure environment for our customers, staff and visitors, as well as protect Premier Pitch property.

CCTV systems are based around digital technology and therefore need to be treated as information that will be processed under the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation.

Premier Pitch will have due regard to the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, Premier Pitch will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.

Premier Pitch has produced this policy in line with the Information Commissioner's CCTV Code of Practice. Premier Pitch's system comprises a number of fixed and dome cameras located both internally and externally around the building. All cameras maybe monitored and are only available for use by approved members of staff.

The CCTV system is owned by Premier Pitch and this policy will be subject to review on an annual basis.

The purpose of this Policy is to regulate the management, operation and use of the CCTV system at Premier Pitch.

#### 2. Purpose of CCTV

Premier Pitch has installed a CCTV system to:

- To increase the personal safety of customers and we can reduce the fear of physical abuse, intimidation and crime.
- Protect Premier Pitch buildings and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- To support the Police in a bid to deter and detect crime.
- Assist in prevention and detection of crime.
- Assist with the identification, apprehension and prosecution of offenders.
- Assist with the identification of actions/activities that might result in the removal of customers.
- Monitor security of Premier Pitch's building.
- Ensure the "house rules" are being adhered to and to identify and reprimand rule breakers.

The system will be provided and operated in a way that is consistent with an individual's right to privacy

#### 3. Operation

The CCTV surveillance system is owned by Premier Pitch.

The General Manager is responsible for the day-to-day operation of the system and ensuring compliance with this policy. R S Security Services Limited (Registered 11 Midland Road, Scunthorpe, North Lincolnshire, DN16 1DQ) also have access to the systems to support the team with the security of the business.

The CCTV system is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements of the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and the Commissioner's Code of Practice.

Cameras will be used by both the General Manager and RS Security Services to monitor activities within Premier Pitch and other areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and wellbeing of the customers within the Premier Pitch buildings.

Static cameras will not focus on other businesses or private property.

Operators of cameras with tilt and pan and zoom capability, staff will not direct cameras at an individual, their property or a specific group of individuals.

Downloads will only be released to the media or the police for use in the investigation of a specific crime and with the written authority of the police.

The planning and design of the existing CCTV system has endeavored to ensure that the CCTV system will give maximum effectiveness and efficiency, but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner, have been placed at access routes and areas covered by the Premier Pitch CCTV System.

#### 4. Image Viewing and Download Procedures

#### 4.1 Viewing

Recordings may be viewed by the police in the presence of the General Manager or Director following a specific data access formal request. Otherwise, permission to view CCTV data will depend on the subject of the potential investigation.

The General Manager is authorised to review CCTV recordings to ascertain the circumstances relating to potential incidents involving customers, staff, contractors, visitors/public incidents. This can take place on personal devices as well as office equipment.

The CCTV runs via live stream in the office at all times and can be viewed by the staff on duty. This will not be shown to other customers at any time.

Note: The General Manager may take action to secure footage that may relate to an incident involving

staff and others until such time that it has been decided that it is required for viewing and/or download or it can be erased.

#### 4.2 Download Procedure

Should a download be required as evidence, an electronic copy may only be made by the General Manager or Director.

Where this is to be released to the Police this will only be released on receipt of a completed CCTV Data Release Form (Appendix A) and sight of their warrant card/proof of identity.

Where this is requested by a member of the public relating to a customer incident, a CCTV Data Release Form will need to be completed.

CCTV footage may be released for civil proceedings at the written request of a solicitor or insurance company. Again a CCTV Data Release Form will need to be completed.

All requests for downloads will be retained by the General Manager for 12 months or after the incident that the download relates to has been closed.

Downloads requested by other parties and for purposes outside the scope of this policy are not permitted.

#### 5. Breaches of this policy

Any suspected breach of this Policy by Premier Pitch staff will be considered under our internal Disciplinary Policy and Procedures.

#### 6. Overview of the System

The CCTV system runs 24 hours a day, 7 days a week.

The CCTV system comprises fixed position cameras; pan tilt and zoom cameras; monitors; multiplexers; digital recorders and public information signs.

CCTV cameras are located at strategic points on site, cameras view the pitches and the party rooms, they cover the entrance and exit point for the sites and the car park.

CCTV signs will be prominently placed at strategic points and at entrance and exit points of the Premier Pitch sites to inform staff, customers, visitors and members of the public that a CCTV installation is in use, its purpose and details of the operator.

Although every effort has been made to ensure maximum effectiveness of the CCTV system; it does not cover all areas and it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

#### 7. Data Protection Act 1998

For the purpose of the General Data Protection Regulation (GDPR) the General Manager is the designated data controller.

- CCTV digital images, if they show a recognisable person, are personal data and are covered by the General Data Protection Regulation (GDPR). This policy is associated with Premier Pitch's GDPR Policy, the provisions of which should be adhered to at all times.
- Premier Pitch has registered its processing of personal data (including CCTV) with the Information Commissioner's Office (ICO).

Where new cameras are to be installed on Premier Pitch premises, Part 4 of the ICO's CCTV Code of Practice will be followed before installation:

- The appropriateness of and reasons for using CCTV will be assessed and documented;
- The purpose of the proposed CCTV system will be established and documented;
- Responsibility for day-to-day compliance with this policy will be established and documented

#### 8. Access to images

#### 8.1 Individual Access rights

The General Data Protection Regulation gives individuals the right to access personal information about themselves, including CCTV images.

All requests for access to view/copy CCTV footage by individuals should be made in writing to Premier Pitch's Data Controller and a CCTV Data Release Form should be completed (Appendix A).

Premier Pitch will respond promptly and at the latest within 30 calendar days of receiving the request and processing fee, this will be determined by the General Manager and sufficient information to identify the images requested.

If Premier Pitch cannot comply with the request, the reasons will be documented. The requester will be advised of these in writing, where possible.

#### 8.2 Access to Images by Third Parties

Unlike Data Subjects, third parties who wish to have a copy of CCTV images (i.e. images not of the person making the request) do not have a right of access to images under the GDPR, and care must be taken when complying with such requests to ensure that neither the GDPR or the CCTV Policy are breached.

As noted in section 8.1 requests from third parties will only be granted if the requestor satisfies the following criteria:

- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry)
- Prosecution Agencies and their Legal Representatives
- Insurance Companies and their Legal Representatives

All third party requests for access to a copy of CCTV footage should be made in writing to Premier Pitch's Data Controller using the CCTV Data Request Form (Appendix A).

A law enforcement or prosecution agency is requesting access they should make a request in accordance with the General Data Protection Regulations.

#### 9 Retention and Disposal

Recorded images will be retained for no longer than 31 days from the date of recording, unless a member of staff has identified the recording may be required for evidential purposes or the investigation of crime or otherwise required and retained as a download with the requisite approval form.

All images on electronic storage will be erased by automated system overwriting. All downloads, still photographs and hard copy prints will be securely disposed of as confidential waste. The date and method of destruction will be recorded on the bottom of the original approval to copy held by the General Manager.

Any clips retained due to potential evidential purposes will be stored on a case-by-case timescale limit.

#### 10 Complaints regarding operation of system

Complaints regarding the CCTV system and its operation should be made directly to the General Manager.

## 11 Record of Policy

16<sup>th</sup> November 2021

Authorised and Signed off by Pete Fegan and Karen Locking.

Version Number	Next Review	Reviewed	Notes	
1	Created 16 <sup>th</sup> November 2021		Authorised and Signed off by Pete Fegan and Karen Locking	
2	16 <sup>th</sup> November 2022	25 <sup>th</sup> January 2023	No amendments	
3	17 <sup>th</sup> November 2023	30 <sup>th</sup> November 2023	Updated to include RS Security and CCTV Data Release Form (Appendix A).	
4	17 <sup>th</sup> November 2024			

# I am the subject of the CCTV Footage I am requesting (Yes, answer Section 1, 3, 4, 5) I am requesting CCTV Footage on behalf of a friend, family member or client (Yes, please answer all sections and have the data subject sign section 2.1) **SECTION 1: DATA SUBJECT DETAILS** (who the request is about) Title First Name Surname Date of Birth House Name/Number Address 1 Address 2 Town Post Code **Email Address** Telephone Number SECTION 2: DETAILS OF THE APPLICANT MAKING THE REQUEST (if applicable) Full Name Company Name/Contact Name (if applicable) House Name/Number Address 1 Address 2 Town

**CCTV Data Release Form** 

Reviewed: November 2023

Post Code

Appendix A

Telephone Number
Email address
Reference Number (applicable for insurance/solicitor firms representing the data subject only)
Please note:  We are only able to provide footage on the individual whose subject within this request.  Any other information and persons will be pixelated in line with the Data Protection Act 2018. If you require non-pixelated footage, your request should be dealt with by an insurance/solicitor company or by the police.
SECTION 2.1: DATA SUBJECT CONSENT (if applicable)
I confirm I am the named Data Subject in Section 1 and have freely
agreed for the Individual named in Section 2, to request CCTV on my behalf.
SIGNED DATE
SECTION 3: REQUEST DETAILS
Please include the date of incident:
Please indicate a time frame from which your request refers to;
FromTo(Information should be provided using the 24 hour clock HH:MM)
Please indicate an incident location, which pitch or areas inside / outside for example:
Details of the Incident  NOTE: Places attempt to be as appoint as possible. For example, An incident involving player in a

NOTE: Please attempt to be as specific as possible. For example: An incident involving player in a yellow number 5 bib on pitch number 2.

- Description of the players involved
- Time of incident
- Names of individuals involved
- Cars involved
- Area of the carpark accident took place.
- An idea of what your understanding of the incident is

SECTION 4: SUPPORTING DOCUMENT
In order for your request to be processed, Premier Pitch requires;  • A clear copy of valid photographic ID of the <b>data subject</b> (i.e. Passport, Driver's License)
<ul> <li>Proof of address, dated within the last 3 months for the data subject (i.e. Bank statement, utility bill)</li> </ul>
I confirm that I have inserted <b>copies</b> of the above <b>(please tick)</b>

#### **SECTION 5: DECLARATION**

In exercise of the right granted to me under the terms of the Data Protection Act 2018, I request that you provide me with a copy of the information above. I understand that I will only receive footage of the data subject. Any third party information will not be provided and will be **pixelated**, **however** if it is an insurance company or solicitor requesting the information an non-pixelated copy can be provided as long as signed consent has been given by the data subject.

I confirm that I am the data subject, or that the data subject is aware their personal data will be processed for purposes indicated above.

I understand that Premier Pitch have one calendar month to respond to my request. This timeframe is statutory, unless there are circumstances in which this timeframe requires extension, or where further

There may also be a fee requested for this information which will be discussed before processing.				
I have read and understood the terms of this Declaration and <b>consent</b> for details to be submitted to Premier Pitch.	r my personal			
Signed	Date			

Please send your request to the address below;

General Manager Premier Pitch Kettering Road Scunthorpe North Lincolnshire DN16 1UW

Email: office@premierpitch.co.uk