



Minchinhampton Golf Club

CCTV Policy

Introduction

Minchinhampton 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. We are committed to complying with our legal obligations and ensuring that any personal data is recognised and respected.

Purpose

This policy sets out Minchinhampton Golf Clubs approach to the use of CCTV at the Clubhouses and surrounding area, and its effect on employees, Members and visitors.

In accordance with the Information Commissioner's Office (ICO) requirements, Minchinhampton Golf Club has registered as a user of CCTV for the purposes defined in this policy. In line with the ICO's requirements the use of CCTV is reviewed annually to ensure it can be justified.

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

The primary use of the CCTV cameras at the Clubhouses is for the purpose of detecting and preventing crime, protecting the property and facilities, identifying any health and safety issues, and for personal security of Members, visitors and employees whilst at Minchinhampton Golf Club.

It is not the Club's intended purpose to use CCTV for monitoring the work of employees, nor finding out whether or not they are complying with the organisation's policies and procedures.

Responsibilities

The Data Controller at Minchinhampton Golf Club is the General Manager. Day to day responsibility for ensuring this policy is appropriately managed and controlled, in accordance and as defined by the ICO, is the Clubhouse Services Manager.

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 visitors 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
- It is not the intention that CCTV at the Clubhouses will be used to monitor the quality and amount of work completed by an employee
- Surveillance images and information will be subject to appropriate security measures to safeguard against unauthorised access and use
- Fair processing requirements will be observed at all times
- Any decision re any future CCTV camera installations would be for the Board and would consider privacy requirements and a cost-benefit assessment

Procedures

CCTV Footage

Live CCTV footage can only be viewed by:

- General Manager
- Clubhouse Services Manager
- A Club Director
- Other employees of Minchinhampton Golf Club but only by way of permission of the above

Recorded CCTV footage can only be reviewed (not deleted or amended) by:

- General Manager
- Clubhouse Services Manager
- A Club Director
- Other employees of Minchinhampton Golf Club by way of permission of the above
- The Police under the supervision of the General Manager

Camera surveillance will be maintained at all times and footage continuously recorded and held on system memory for a period of up to 60 days. Access to the on-site system is

password protected. The Clubhouse Services Manager is responsible for the system's maintenance and receives full training on how to use the system.

Use Of CCTV

As stated, the primary purpose of CCTV is to protect the property, Members, visitors and employees of Minchinhampton Golf Club. However, we recognise that when CCTV is installed in a workplace, it is likely to capture pictures of Members, visitors, 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 a case, the footage must be requested by the Vice Chairman of the Board. In the case of a worker (non-Club employee), any evidence identified may be passed to their employer.

In accordance with the ICO's CCTV Code of Practice, where footage is used in disciplinary proceedings, the footage will be retained, and the employee/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 Club's property and facilities, health and safety requirements, and for personal security of Members, visitors and employees whilst at Minchinhampton 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 General Manager, referring to the Board 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 40 days of their request, as long as they have not been automatically deleted.

Any person making such a request should write to/contact the General Manager 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 General Manager.

Version Control:

| Version | Risk Committee review date | Board endorsement date | Changes |
|---------|----------------------------|------------------------|-----------------------------|
| V1 | | June 2017 | |
| V2.0 | 12/01/2022 | | Annual Review |
| V2.0 | | 31/01/2022 | Board Approved – no changes |
| V2.1 | Aug 2023 | Sept 2023 | Annual Review |
| V3.0 | | | Published Oct 2023 |