



WILMSLOW
PHOENIX
SPORTS CLUB

Camera Policy

January 2022

Wilmslow Phoenix Sports Club

Oakwood Farm

Styal Road

Cheshire

SK9 4HP

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1. Introduction

Wilmslow Phoenix Sports Club (WPSC) is fully committed to operating and providing a safe and inclusive environment, it therefore has in place an Internet Protocol TV (“IPTV”) Camera System to assist in providing a safe and secure environment for members and visitors alike, in addition to providing pitch viewing access to approved remote based members, and a live feed of pitch activity into the clubhouse on match days. There is also a CCTV system within the clubhouse for the security of the premises.

IPTV Camera Systems are based around digital technology and therefore need to be treated as information that will be processed under the General Data Protection Regulations 2018 (GDPR). The persons ultimately responsible for data protection within WPSC are the Club Secretary, and the System Controller, and all access to the system, to comply with GDPR, is password protected.

The WPSC Hon. Secretary is Penny Sparrow, who can be contacted at psparrow66@gmail.com

The WPSC System Controller is Rob Hunter, who can be contacted at chrisandrob.123@ntlworld.com

The IPTV system comprises cameras located at elevated positions externally. There is also a CCTV system of cameras within the premises of the clubhouse. The cameras may be monitored, and remote access is only available for use by approved members of the club. Images can be stored for a period of 24 days and viewed on written request by approved members of the WPSC Council and by appropriate members of the authorities (as outlined in Section 6) for the purposes of identification.

The IPTV system has been purchased jointly by Wilmslow Phoenix Sports Club and Wilmslow Phoenix AstroTurf Ltd (WPAL) and will be subject to review on an annual basis.

The purpose of this Policy is to regulate the management, operation and use of the IPTV and CCTV systems at WPSC. This document sets out the accepted use and management of the IPTV system and images to ensure WPSC complies with the General Data Protection Regulations 2018 (GDPR), Human Rights Act 1998 (HRA) and other legislation.

WPSC has produced this policy in line with the Information Commissioner’s CCTV Code of Practice and the Home Office Surveillance Camera Code of Practice, and WPSC is registered with the ICO.

2. Purpose of Cameras

WPSC has installed a camera system primarily to:

- Provide a feed of pitch activity to the clubhouse on match day.
- To monitor activity within the clubhouse and its surrounds especially when it is supposed to be unoccupied.

Additional purposes can include:

- Remote access to confirm legitimate pitch usage.
- Provide a notification of pitch activity to alert unofficial use.
- Provide identification of unauthorised activity in the clubhouse.

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

The CCTV system operates internally and externally around the clubhouse and can and does record images which can then be viewed by authorised WPSC members for the purposes of clarification and identification. There is no microphone to pick up sound at the pitch.

3. Operation

The camera systems have been purchased jointly by WPSC and WPAL.

The WPSC System Controller is responsible for the day-to-day operation of the system and ensuring compliance with this policy.

The cameras will not focus on private homes, gardens and other areas of private property outside of Wilmslow Phoenix boundaries.

Materials or knowledge secured as a result of the camera system will not be used for any commercial purpose.

The planning and design of the existing camera systems has endeavoured to ensure that the camera systems will give maximum effectiveness and efficiency but it is not possible to guarantee that the camera systems will cover or detect every single action 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 camera systems.

Image Viewing

Static screen grabs are a possibility on certain devices being used to view the live footage. This capability is a result of standard built in features on modern mobile devices.

Any registered user given access to the software which provides the image viewing capability will be trained in the appropriate use of the software. Users are expected to only view a live feed and not take screen grabs unless for trouble-shooting support purposes.

Breaches of this Policy

Any suspected breach of this Policy by WPSC authorised users will be considered under WPSC Disciplinary Policy.

4. Overview of System

The WPSC camera live feed is available 24 hours a day, 7 days a week. The WPSC CCTV system comprises a recording system designed to record CCTV images from the network of cameras located as below:

External Camera Locations:

Car park 1 – located above bar store looking across the car park towards the Astroturf pitch.

Car park 2 and Astroturf pitch – both located on the same post; one providing security views of the Astroturf pitch, the other across the car park towards the clubhouse main entrance and beyond.

Car park 3 – located above the changing room door (fire door) looking across car park towards the Lacrosse and Hockey containers.

Rear fire door – externally looking out towards the Summer hockey pitch and wall of bar store.

Outdoor seating area – located over the Cricket corridor door looking across the patio.

Internal Camera Locations:

Bar camera – located above sinks looking across the bar.

Till camera – located on the window side of the bar looking across the bar.

TV camera – located by the honours boards looking across the main clubhouse.

Reception – located above the clubhouse glass doors looking across to the entrance.

CCTV signs will be prominently placed at strategic points at the entrance/exit of the Astroturf pitch and clubhouse premises to inform members and visitors that a camera installation is in use.

The WPSC CCTV system does record the images, and these are destroyed in accordance with Section 7 of this policy by an automatic overwrite day by day after the month period has ended, except to comply with requests for images as outlined in Sections 6 and 7.

5. GDPR

For the purpose of the General Data Protection Regulations 2018 (GDPR), WPSC is the data controller in the event any images are ever recorded.

- CCTV digital images, if they show a recognisable person, are personal data and are covered by the GDPR 2018. This policy is associated with the WPSC Privacy Policy, the provisions of which should be adhered to at all times.

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

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

6. Access to Images

Individual Access Rights

The GDPR 2018 gives individuals the right to access personal information about themselves, including images wherein they are recognisable.

The camera covered by this policy is intended to stream live pitch activity to the clubhouse and to additional mobile devices to confirm legitimate booked use of the pitch, and to confirm stable system operation remotely.

Only under exceptional circumstances would a static image be generated.

All requests for access to view/copy footage by individuals should be made in writing to the WPSC Hon. Secretary for distribution between the System Controller and the WPSC Chair to assess the request and provide an auditable trail of the request and its determination.

Requests for access to images must include:-

- The reason for the request
- The date and time the image was recorded
- Information to identify the individual, if necessary

- The location of the camera
- Proof of Identity

WPSC will respond promptly, and at the latest within 30 calendar days of receiving the request processing fee (this will depend on the cost and type of storage device required) determined by the WPSC Hon. Secretary, and sufficient information to identify the images requested. While the request is being processed it may be necessary to download the information so that it is not overwritten before determination of the request is completed.

If WPSC cannot comply with the request, the reasons will be documented.

The requester will be advised of these in writing, where possible.

Access to Images by Third Parties

Unlike Data Subjects, third parties who wish to have a copy of 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, the HRA nor the Camera Policy are breached. As noted above, requests from third parties will only be granted if the requester satisfies the following criteria:

- Law enforcement agencies (where access to images 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 the WPSC Hon. Secretary.

7. Retention and Disposal

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 24 days from the date of recording. Images will be automatically overwritten after this point.

Where an image is required to be held in excess of the retention period referred to above, the secretary, will be responsible for authorising such a request.

Images held in excess of their retention period will be reviewed on a three monthly basis and any not required for evidential purposes will be deleted.

Access to retained CCTV images is restricted to the WPSC System Controller and WPSC Chair, and other persons as required and as authorised by those people.

8. Central Responsibilities

The WPSC Hon. Secretary is responsible for producing and reviewing this Policy.

The WPSC Council is responsible for approving this Policy.

The WPSC Hon. Secretary is responsible for compliance with and implementation of procedures to comply with this policy.

9. Complaints regarding operation of system

Complaints regarding the Camera system and its operation should be made in writing to the WPSC Hon. Secretary.

10. Associated Policies and Guidance

- CCTV Code of Practice
- Home Office Surveillance Camera Code of Practice.