



WILMSLOW  
**HOCKEY**  
CLUB

**Camera Policy\_2109-18**

**September 2018**

**Wilmslow Hockey Club**

**Oakwood Farm**

**Styal Road**

**Cheshire**

**SK9 4HP**

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## Appendix:

Example screenshots of current camera

# 1. Introduction

Wilmslow Hockey Club (WHC) 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 club house on match days.

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 person ultimately responsible for data protection within WHC is the **Welfare Officer (Linda Kelman)**.

The system comprises a single camera located at an elevated position on the frame of the Wilmslow Phoenix catch net at the club house end of the astro-turf pitch. The camera maybe monitored and remote access is only available for use by approved members of the club.

The IPTV system is owned by WHC 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 system at WHC. This document sets out the accepted use and management of the IPTV system and images to ensure WHC complies with the Data Protection Act 1998 (DPA), Human Rights Act 1998 (HRA) and other legislation.

WHC has produced this policy in line with the Information Commissioner’s [CCTV Code of Practice](#) and the [Home Office Surveillance Camera Code of Practice](#).

## 2. Purpose of Camera

WHC has installed a camera system to primarily: .

- Provide a feed of pitch activity to the clubhouse on match day.

Additional purposes can include:

- Remote access for John Edwards (**Wilmslow Phoenix Pitch Booking Manager**) to confirm legitimate pitch usage.
- Provide a notification of pitch activity to alert unofficial use

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

There will be no recording of games or pitch activity; This camera only provides a live stream and there is no microphone to pick up sound at the pitch.

## 3. Operation

The camera system is owned by WHC.

The **Camera Manager (James Dukes)** is responsible for the day-to-day operation of the system and ensuring compliance with this policy. The **Camera Manager** will hold the minimum Safeguarding and DBS certification acceptable to England Hockey.

The camera 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 system has endeavoured to ensure that the camera system will give maximum effectiveness and efficiency but it is not possible to guarantee that the camera system 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 WHC Camera System.

### 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 WHC authorised users will be considered under WHC Disciplinary Policy and Procedures.

## 4. Overview of System

The camera live feed is available 24 hours a day, 7 days a week but images are not recorded.

The camera system comprises a single fixed position camera with a zoom lens; reolink mobile app; reolink client for OSX; public information signs.

The camera is located at the optimum strategic point on the edge of the pitch at an elevation where it is least likely to be hit by balls, or come into physical contact with any person.

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

## 5. GDPR

For the purpose of the Data Protection Act 1998, WHC 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 WHC Data Protection 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 club house and two additional mobile devices used by **Wilmslow Phoenix Pitch Booking Manager** to confirm legitimate booked use of the pitch, and the **Camera Manager** to confirm stable system operation remotely.

Only under exceptional circumstances would a static image be generated. The camera software has a motion detection alert capability (it is normally bought as a security camera) that can be set to send an email and/or push notification if motion is detected during a period this setting is active. This might result in the WP Pitch Booking Manager or Camera Manager to want to take a screenshot of unexpected or unauthorised pitch activity to raise or discuss the matter with fellow committee members.

All requests for access to view/copy a static image by individuals should be made in writing to the **Welfare Officer**.

Requests for access to images must include:-

- The reason for the request
- The date and time the image was recorded (or thought to be recorded)
- Information to identify the individual, if necessary
- The location of the camera
- Proof of Identity

WHC will respond promptly and at the latest within 30 calendar days of receiving the request processing fee, determined by the **Welfare Officer** and sufficient information to identify the images requested.

If WHC 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, HRA or the CCTV Policy are breached. As noted above, requests from third parties will only be granted if the requestor 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 a static image should be made in writing to the **Welfare Officer**.

## 7. Retention and Disposal

There is currently no capability or intention to record footage, but any image captured in a screen shot will not normally be retained at all, except when the image is being used to identify unauthorised activity on the pitch and that the images in this case would be kept for as long, and only for as long as they were needed to complete any investigation. If at some point in the future the camera system is changed facilitating recording of footage, this policy will be reviewed and updated to ensure an adequate retention and disposal procedure is in place.

## 8. Central Responsibilities

The **Camera Manager** is responsible for producing and reviewing this Policy.

The **WHC Committee** is responsible for approving this Policy.

The **Welfare Officer** 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 under the WHC complaints procedure.

## 10. Associated Policies and Guidance

- [CCTV Code of Practice](#)
- [Home Office Surveillance Camera Code of Practice](#).

## Appendix:

[image to be inserted when camera back in situ]