



## Esher RFC CCTV/ Security Policy

### 1.0 Purpose

**1.1 Closed circuit television (CCTV) surveillance is an increasing feature of** daily life, deployed in a variety of areas to which members and Visitors of Esher RFC have access.

1.2 The purpose of this policy is to outline the Esher RFC's approach to the use of CCTV systems for security purposes across the Club and grounds, and to comply with the requirements of the Data Protection Act 1998, the ICO's CCTV Code of Practice 2014, the Regulation of Investigatory Powers Act 2000, Private Security Industry Act 2001, Protection of Freedoms Act 2012 and the Human Rights Act 1998.

1.3 Effective use of CCTV will also facilitate effective implementation of the club's other policies and lead to the resolution of complaints disciplinary procedures and prosecutions more quickly.

### 2.0 Scope

2.1 This policy applies to CCTV and other systems which capture images of identifiable individuals operated for the purposes of promoting security and to identify criminal activity whether occurring, anticipated or perceived in order to enhance the safety and wellbeing of staff, members, and visitors. It also applies to information relating to individuals for the purposes of monitoring activities on club premises, car parks and other public areas.

2.2 The planning and design of CCTV systems has been undertaken to ensure maximum effectiveness and efficiency but cannot guarantee to cover or detect every incident occurring within the areas covered.

2.3 This policy also covers body worn video cameras and specific arrangements for their use are covered in Appendix 1.

2.4 The use of conventional cameras, surveillance cameras and CCTV for other purposes including for artistic, administrative, coaching or research purposes is not covered by this policy.

### 3.0 Policy Statements

3.1 Esher RFC shall be responsible for all CCTV operated upon its estate and shall be the Data Controller for the requirements of the Data Protection Act 1998 ensuring that all obligations are met.

3.2 ..... is responsible for the operation and management of the clubs Security CCTV systems.

3.3 Esher RFC shall ensure that its notification to the Data Protection Register includes the use of CCTV.

3.4 All operators of CCTV systems shall be appropriately trained.

3.5 Appropriate procedures shall be created and followed for the use of CCTV systems with recording, viewing and retention of images undertaken in accordance with approved relevant standards.

3.6 Fixed CCTV shall not routinely be used to record conversations unless specified and signposted otherwise.

3.7 Esher RFC shall not undertake covert surveillance without express authorisation from the 2 members of the GC including the chairman or their appointee and approval of the Head of Security and the Data Protection Officer.

It shall ensure that any such surveillance is compliant with relevant legislation as referred to in paragraph 1.2 above.

3.8 Esher RFC shall deploy appropriate equipment which enables the capture of images adequate for the purpose for which they are being collected.



3.9 Camera siting shall, similarly, be appropriate for the purpose.

### **Monitoring and Sanctions**

3.10 Adherence to this policy, controls around, and the usage of, CCTV shall be reviewed annually by the GC and the appointed officer alongside the General Manager..

3.11 Reports of breaches shall be investigated thoroughly and in accordance with the appropriate legislation.

3.12 As an Officer of the Club, the Club chairman, Legal & Compliance Officer/ Chair of Discipline or his nominee has the authority to investigate alleged breaches of this policy and where necessary may refer individuals to the appropriate channel for disciplinary action (In line with clubs rules and disciplinary policy) .

**4.0 Related Documentation** The below documents can be found on the Clubs policy and procedures pages within the website and noticeboard.

### **5.0 Complaints**

Any complaints about the use of CCTV at the Club should be directed to the clubs complaints procedure or the Chairman as laid out in the Policies and Procedures section on the website/ Noticeboard.

### **6.0 Released Information to Third Parties**

All information that is released to third party persons is the subject of DPA. Information to statutory prosecuting authorities will require DPA legislative forms and those appertaining to the Police are subject to the Information Sharing Agreement. Other Policies such as the Data Protection Policy, Freedom of Information Policy, Information Security Policy, Information and Records Policy and Complaints/Grievance Procedures can be found on the Clubs website/ Notice board.

**The club has the right to add/ remove cameras or change the location as it sees fit at any time.**

### **Esher RFC Disciplinary/ Safeguarding & Child Protection/ Player Welfare Officer**

Tyrone Lawless  
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### **Esher RFC Hon. Secretary**

Nigel Scott  
[Nigel.mcm@ntlworld.com](mailto:Nigel.mcm@ntlworld.com)

### **Esher RFC Hon. Chairman**

Bob Stratton  
[bob@hadleystjames.com](mailto:bob@hadleystjames.com)



## Appendix 1: Arrangements for the Use of Body Worn Video Cameras (BWV)

Body worn video cameras (BWV) are CCTV cameras attached to the uniforms of security staff. These cameras recorded both audio and visual footage. These arrangements have been written by the clubs Data Protection Officer and agreed by the General Committee.

### Purposes of BWV

BWV are used at the Club SIA staff (where appropriate) to enable the recording of incidents where video footage will be beneficial to:

- increase reassurance of members of the Club/ Visitors to a function or event and to protect staff and the community;
- reduce crime and disorder and the fear of crime and disorder;
- reduce antisocial behaviour;
- ensure that the Rugby Club is a safe and secure environment to work, play and socialise; □ increase the safety of security staff;
- reduce escalation of incidents; and
- resolve complaints about security incidents and disciplinary procedures, internally, and prosecutions, externally, more quickly.

### Principles of Use

- Body worn video cameras (BWV) should only be used by accredited security staff (SIA) : any change to this arrangement must be agreed by the General manager and the GC or another member of the Executive Team.
- All BWV shall be managed by the security company that is hired by the club and in line with those companies policies.
- The Head of Security shall be responsible for the use and for training of staff in its use.
- All staff who may use BWV will have full training in their use.
- No staff will be permitted to use BWV until they have agreed to these principles, confirming their receipt, reading and understanding.
- BWV will only be used when determined operationally necessary in support of the purposes outlined above by the General manager and nominated club officer.
- All incidents which involve the use of body one cameras shall be logged, documenting the date, time, reason for use, name of authoriser and name of the person wearing the BWV.
- The person wearing BWV is always responsible for its use.

Before recording commences SIA staff wearing BWV should alert those present that the recording will be taking place stating the following:

- that recording is taking place;
- that this includes audio recording;
- their own name and that of any colleagues;
- the date;
- the time;
- the location; and
- the nature of the incident.



If the recording has started prior to the arrival of the officer at the scene, they should state this upon arrival.

- Where this is not operationally possible, this information should be provided as soon as it is practicable to do so.
- The cameras shall be aimed at those involved in the incident and not at third parties who are not involved.
- SIA Staff should do their best to ensure that those not involved in an incident are not recorded: this may include standing in a position to block them from being filmed or asking them to move.
- BWVs should be permitted to continue for approximately 15 minutes after any incident has concluded the SIA staff wearing the BWV should state the date, and time.
- BWVs should never be used covertly or concealed.
- The security will use a documented BWV footage management system; this system will be compliant with all relevant legislation and provide a full audit trail for the footage to ensure its evidential value.
- Footage on the camera will then be deleted.
- Footage will be retained for 30 days unless required for the purposes of an investigation.
- Every six months, use of BWV shall be reviewed and the BWV footage management system will be audited.

I confirm that I have been trained in the use of Body Worn Video Cameras and have received, read and understood a copy of these arrangements for its use:

Name: .....

Position: .....

Date: .....