



Spalding
Gentlemen's
Society

Official Address:

**The Museum
Broad Street
Spalding
PE11 1TB**

CCTV POLICY

The Spalding Gentlemen's Society (the Society) operates a CCTV surveillance system ("the system") at its Museum premises in Broad Street. The CCTV system and the images produced by it are controlled by the Trustees of the Society, who are the registered data controllers with overall responsibility for how the system is used and for notifying the Information Commissioner's Office about the system and its purpose (a legal requirement of the Data Protection Act 2018).

1. Purpose

The Trustees of the Society considered the need for using CCTV and decided it is required for three main purposes:

- Providing a safe and secure environment for our members, visitors and staff
- Protecting our collections
- Preventing and detecting crime and anti-social behaviour

Except for law enforcement purposes, images will not be provided to third parties.

2. Management and data processing

The system is operated and managed by Spalding Gentlemen's Society. Day to day responsibility for managing legal and regulatory compliance by the Society and data processors has been assigned to the Secretary of the Society's Council, with overall responsibility held by the Trustees of the Council as data controllers.

The CCTV system is supplied by GBSG Ltd, Security House, Donington, Spalding PE11 4TA which undertakes remote monitoring by contractual agreement with the Society. The Society's Council is satisfied that GBSG Ltd is GDPR compliant.

3. Compliance

Images obtained from the system which include recognisable individuals are personal data and are covered by the Data Protection Act, the Data Protection CCTV Code of Practice (revised edition 2008) and the General Data Protection Regulations (GDPR) and should therefore be read together with our Data Protection Policy and Privacy Policy which are available on our website <http://sgsoc.org>.

This policy has been drawn up in accordance with the advisory guidance contained within the Information Commissioner's CCTV Code of Practice.

Full details of the Society's data protection registration are available on the Information Commissioner's Office website.

4. Description

The system is intended to produce images which are as clear as possible and appropriate for the purposes stated. When required, it is operated to provide information and images of evidential value.

Cameras are located in strategic positions throughout the interior of the Museum. Signage is prominently placed in the entrance lobby of the building to inform members, visitors and employees that a CCTV installation is in use. A camera is located at the front exterior of the building pointing directly at the front door. GBSG Ltd ensured that it does not capture any streetscape images.

5. Operation

Images captured by the system are recorded continuously and are monitored by the Society and GBSG Ltd. Images displayed on monitors within the Museum building are not accessible to non-designated controllers and access to the room in which the system is located is strictly limited.

Designated persons having access to the CCTV system are made aware of the sensitivity of handling CCTV images and recordings. The Society's Trustees will ensure that authorised persons are fully briefed and trained in the operational and administrative functions of the system.

All access to recorded images is recorded in the Log on the Society's PC. Access to images is restricted to those who need to have access in accordance with this policy, the Standard Operating Procedure and any governing legislation.

The operation and management of the system is detailed in a CCTV Operator Manual.

6. Information retention

CCTV images shall not be stored for longer than is required for the stated purpose. Images will be deleted once that purpose has been discharged.

7. Disclosure

Disclosure of recorded material will only be made to third parties in accordance with the purposes of the system and in compliance with legal and regulatory requirements.

8. Access

Anyone who believes they have been filmed by the system can request a copy of the recording within the period of its retention, subject to any restrictions covered by the Data Protection Act and the GDPR. This is called a Subject Access Request. You also have the right to request that inaccurate data be corrected or erased and to seek compensation for any harm caused. We make sure that access requests are dealt with in line with legal and regulatory requirements. Advice will be sought from the ICO where necessary.

Please refer to our Privacy Policy which sets out how to make a Subject Access Request and who to contact at the Society.

9. Covert recording

Covert recording may only be used in very limited circumstances in cases of suspected criminal activity when the objective of making the recording would be seriously prejudiced should the individual(s) concerned be informed of such surveillance. Such a recording must include a justification of the need to use such methods to obtain evidence in a specific case, consideration of other suitable methods and a statement of how long the covert monitoring should take place. The decision to undertake covert recording must be fully documented, records held securely and the decision reviewed every 28 days.

10. Feedback

If you have any concerns or complaints regarding the use of the Museum's CCTV system please contact us at info@sgsoc.org or write to us at the address below:

The Secretary, Spalding Gentlemen's Society, The Museum, Broad Street, Spalding PE11 1TB

We may amend this privacy policy from time to time to ensure it remains up-to-date and continues to reflect how and why we operate a CCTV system.

This Policy was approved by the Council of the Spalding Gentlemen's Society in May 2018 and will be reviewed no later than 2021.