



GALWAY GOLF CLUB POLICY ON CCTV SYSTEM & DATA MANAGEMENT

Closed Circuit Television System (CCTV) is installed in Galway GC under the remit of the Club Council.

Purpose of Policy:

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of the internal & external environs of premises under the remit of the Club Council of Galway GC. All cameras are under the control of the Management of Galway GC.

Purpose of CCTV System:

CCTV is installed internally and externally in the premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants in relation to crime, vandalism and theft. CCTV is also used as an aid to Health and Safety and to the discharge of the club's duty of care within and/or in the external environs of the premises during both the daylight and night hours each day.

Scope of Policy:

This policy applies to all club personnel, members and visitors to Galway GC and relates directly to the location and use of CCTV and the monitoring and recording and subsequent use of such recorded material.

General Principles:

The Council of Galway GC has a statutory responsibility for the protection of its property, equipment and other plant as well as providing a sense of security to its employees, members and visitors to its premises. The primary aim of CCTV monitoring is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and materials. Galway GC further owes a duty of care under the provision of Health, Safety and Welfare legislation and utilises CCTV systems and its associated monitoring and recording equipment to this end.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

Information obtained through video monitoring may only be released when authorized by the GM and / or Club Council.

CCTV monitoring of public areas, for security purposes, will be conducted in a manner consistent with the industry code of practice, which prohibits monitoring based on the characteristics and classifications contained in Equality and other related legislation e.g. race, gender, sexual orientation, national origin, disability etc.

Video monitoring of public areas, for security purposes, within the said establishment, is limited to uses that do not violate the reasonable expectation to privacy as defined by law.

Data from C.C.T.V. system will be accessed and used in accordance with Data Protection Regulations. Cameras are located in the following internal areas x 17no:



- Main Entrance Door
- Pro Shop
- Reception Lobby / Main Entrance / Office Hatch x 3 no.
- Rear Lobby Area incl 2 access doors & computer area
- Men's Inner Locker Room (entrance & exit only + competition pc) *
- Men's Outer Locker Room Door*
- Corridor to Ladies Locker Room / Managers Office / Club Office *
- Ladies Locker Room Computer & Entrance / Exit Door*
- External Exits from Ladies Locker Room x 2
- Main Stairs *
- Bar *
- Dining Room Servery Area *
- Dining Room *
- Buggy Shed *

Cameras are located in the following external areas x 14no:

- Main Entrance Gate
- 1st Tee Complex / Short Game Area **
- Putting Green / Front Carpark
- Managers / Committee Room Windows
- Driveway
- Officer Parking
- External Exit / Entry to Gents Outer Locker Room
- Rear Carpark
- Goods Delivery Area *
- Balcony Area
- Entrance to Buggy Shed / Caddy Car Dispenser
- Machinery Maintenance Area x 3 *

* denotes new locations Jan 2016

** denotes new locations Dec 2018

CCTV Signage in the club which will include the name and contact detail of the data controller as well as the specific purposes for which the CCTV cameras are in place.

The right of access for members, staff and visitors to images captured by CCTV cameras shall be in accordance with the Data Protection Acts 1998 & 2003 as outlined below.

Data Protection:

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts, 1988 & 2003. Under the Data Protection Acts a 'data controller' is the individual or the legal person who controls and is responsible for the keeping and use of personal information in manual files or in computerised form. The Data Controller in respect of images recorded and stored by the CCTV system in the Club is the GM on behalf of the Club Council.

The personal data recorded and stored by the CCTV system will only be available to the data controller and will be used only for the purposes outlined on the signage.



Individuals whose images are recorded and stored by the CCTV system shall have the right to request and receive a copy of personal data processed by the system. Such requests shall be made in writing to the data controller and shall be complied with within a maximum of 40 days. Personal data recorded by the CCTV system shall be retained for a maximum of 28 days. Thereafter, it will be deleted automatically. The recorded footage and the monitoring equipment shall be securely stored in the GM's office. Unauthorised access to that office is not permitted at any time.

The following procedures shall be followed in the event that An Garda Síochána seek to view or take a copy of CCTV footage from the Club's CCTV systems:

1. The data controller shall satisfy himself/herself that there is an investigation underway by telephoning the Garda Station of the requesting Garda and speaking to the Station Sergeant or higher or to a member in the District Office.

2. A request from An Garda Síochána must be made in writing on Garda headed notepaper.

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Club Council.

Responsibilities:

The GM will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the Club Council
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the club
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Ensure that the CCTV monitoring at the club is consistent with the highest standards and protections
- Review camera locations and be responsible for the release of any information or material in compliance with this policy
- Maintain a record of the release of discs or any material recorded or stored in the system
- Ensure that material is not duplicated for release
- Ensure that the perimeter view from fixed location cameras conform to this policy both internally and externally
- Provide a list of the CCTV cameras and the associated monitoring equipment and the capabilities of such equipment, located in the club to the Club Council for formal approval (see above).
- Give consideration to and refer to the Club Council member, staff and visitor petitions regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the club and be mindful that no such infringement is likely to take place
- Advise the Council to ensure that adequate signage, at appropriate and prominent locations is displayed
- Ensure that external cameras are non-intrusive in terms of their positions and views of residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitors are stored in a secure place with access by authorized personnel only



- Ensure that recorded material is retained for period not longer than 28 days and will then be erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Club Council
- Ensure that camera control is solely to monitor suspicious behaviour and not individual characteristics.
- Ensure that camera control is not in breach of the intrusion on intimate behaviour by persons in public areas.

Approved by Club Council 10th February 2016