

LEATHERHEAD TENNIS CLUB - CCTV POLICY

Introduction

The purpose of this policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at Leatherhead Tennis Club (LTC).

The system comprises a small number of fixed cameras located at the front, the back and inside the clubhouse. All cameras are linked to the CCTV system which can only be accessed by the Clubhouse Maintenance Co-ordinator or a Club Director. LTC owns the CCTV system.

This policy will be subject to periodic review by the Club Directors and follows Data Protection Act guidelines.

Objectives of the CCTV Policy

The objectives of the club's use of CCTV are:

- a) To increase the personal safety of club members especially when leaving the club late at night.
- b) To deter possible vandalism and other crime against the clubhouse, club equipment and members' property.
- c) To support the police in identifying, apprehending and potentially prosecuting offenders.

Statement of Intent

The CCTV system will be registered with the Information Commissioner and aims to comply with the requirements of the Data Protection Act and the Commissioner's Code of Practice. The club will treat the system and all recordings, information and documents obtained as 'protected data'.

The system is not an 'active' system. It is not being continually watched or monitored. There is no easily accessed viewing screen and Club Directors will not use it to monitor normal membership activities in or around the clubhouse. The cameras are fixed and cannot be directed to follow or track an individual. There are no cameras in changing rooms / toilets, nor do they monitor play on court. The cameras do not focus on private homes, gardens, and other areas outside the club.

Cameras and recordings will be used to identify adverse activity that has or may have occurred. Images will only be released for use in the investigation of a specific event at the request of the police. Images will not be released to the media or social media for purposes of entertainment. Materials or knowledge secured as a result of CCTV use will not be used for any commercial purpose.

As required by the Code of Practice, warning signs, will be placed at access routes to the areas covered and on the notice board inside the clubhouse.

Operation of the System

The CCTV system will be managed by the Club Directors in accordance with the principles and objectives of this policy.

The day-to-day administration and control will be the responsibility of the Clubhouse Maintenance Co-ordinator. The system will operate 24 hours a day, seven days a week, recording all activity. The co-ordinator will check and confirm its functional and efficient operation on a regular basis. The Club Directors will undertake or arrange its regular servicing, maintenance, and repair when appropriate.

All access to recorded footage will be password protected and restricted to the Clubhouse Maintenance Co-ordinator and/or a Club Director.

Recording and Retention of Data

Images will be recorded 24 hours a day throughout the year. Up to 14 days activity can be held on the system. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

The Club Directors will log any footage required to be viewed after an incident or suspected incident, noting the date and time. The Club Directors will also log any footage released to the police or other authorised applicants. A register will be maintained for this purpose. Requests by the police can only be authorised under Section 29 of the Data Protection Act 1998.

Should images be required as evidence, footage may be released to the police. Images remain the property of the club and the club retains the right to refuse permission for the police to pass the footage to any other person. The police may require the club to retain images for use as evidence in the future. If footage is required for future purposes, the date and time of the footage will be noted in the log and the footage isolated and stored securely. The log will be signed by the Clubhouse Maintenance Co-ordinator or a Club Director.

Applications received from outside bodies (e.g. solicitors) to view or release footage stored will be considered by the Club Directors. In these circumstances, images will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings or in response to a Court Order. A fee may be charged in such circumstances.

Breaches of the code (including breaches of security)

Any breach of the policy will initially be investigated by the club without undue delay using appropriately independent club personnel.

Complaints and Access by the Data Subject

Any complaints about the club's CCTV system should in the first instance be addressed to the Club Secretary. Complaints will be dealt with in accordance with the Information Commissioner's CCTV Code of Practice.

The Data Protection Act provides data subjects (individuals to whom "personal data" relate) with a right to data held about them, including those obtained by CCTV. Requests for Data Subject Access should be made through the Club Secretary. The club reserves the right to make a charge of up to the statutory amount as permitted by Parliament – currently £10.

Public information

Copies of this policy will be available to the public from the club website.

Issued 18 October 2022