## ANGMERING-ON-SEA LAWN TENNIS CLUB



## **CCTV Policy**

### **Purpose of Policy**

The purpose of this policy is to regulate the use of Closed Circuit Television ("CCTV") in the monitoring of the club premises under the remit of the Management Committee. AOSLTC is registered with the Information Commissioner (under registration number ZB049726) and will seek to comply with the requirements both of the Data Protection Act 2018 ("DPA") and the General Data Protection Regulations ("GDPR"), as well as the Commissioner's Code of Practice for CCTV.

### **Purpose of CCTV Systems**

AOSLTC is committed to ensuring, as far as possible, a safe, secure and friendly environment for members and visitors. CCTV images are captured in public areas and stored responsibly, without sound, solely for this purpose, and no other purpose, according to UK law.

#### Scope of Policy

This policy applies to all members of and visitors to AOSLTC, and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material. There are currently 5 external cameras in operation.

The locations of the cameras are:

- Fixed
  - o Left of the single blue entrance door facing the double patio doors;
  - Left hand corner of the clubhouse building when approaching from the car park;
  - o Right hand corner of the clubhouse building when approaching from the car park;
  - Attached to the blue shed viewing the area behind the clubhouse;
- Rotating
  - Corner of the clubhouse facing the courts. This will continually rotate to cover the court areas.

There are signs around the building notifying people that a CCTV system is in operation. A "QR Code" is on the signs providing further information.

### **General Principles**

- AOSLTC Management Committee has the responsibility for the protection of its property and equipment, as well as providing a sense of security to its members, visitors and invitees to its premises.
- AOSLTC utilises CCTV systems as a mode of security and surveillance for the purpose of enhancing the quality of the environment at AOSLTC.
- The primary aim of CCTV monitoring, at AOSLTC premises, is to deter crime and vandalism and to assist in the protection and safety of the premises and its associated members, equipment and materials.
- 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.
- The CCTV system will operate 24 hours each day, every day of the year, recording all activity.
- Information obtained through video monitoring may only be released when authorized by the CCTV Administrators (Head Coach, Premises Manager and Club Administrator) following consultation with the Management Committee.
- 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.
- The use of CCTV cameras will be indicated to members and visitors to the Club by signage including an image
  of a CCTV camera and stating "WARNING Images are being recorded for the purposes of public safety and
  crime prevention".
- Data from the CCTV system will be accessed and used in accordance with Data Protection law.

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- Cameras are located as listed above in 'Scope of policy' section.
- Members and visitors will be informed of the existence of the CCTV system within membership information
  and by clearly visible signs on the club premises and a copy of this policy will be available on the clubs
  website.
- The right of access to images captured by CCTV cameras shall be in accordance with the DPA and GDPR (and any subsequent replacement or additional data protection legislation).

### **Access and Monitoring**

Only the Head Coach, Premises Manager and Club Administrator assisting with the security of the club have access to the system. The system is passpattern/password protected. The Head Coach is alerted if the system is activated to enable swift checking of the system playback on a daily basis, if required. The committee will always maintain a list of approved personnel with access.

The CCTV footage is saved for a maximum of 30 days in line with the Information Commissioners Office (ICO) and Government policies covering the use of CCTV systems. More information can be found at the following link <a href="https://ico.org.uk/your-data-matters/cctv/">https://ico.org.uk/your-data-matters/cctv/</a>

All individuals with access to the system have been instructed not to share, save or distribute **ANY** imagery captured by the CCTV system. This includes posting to social media or social groups. Any improper use of this system could lead to a removal of membership.

Those accessing the system can only do so for its intended purpose If a safeguarding concern is identified the Welfare Officer will be contacted immediately to investigate the incident / allegation and access the system.

Any member has the right to have a copy of any image of them. Requests must be made within 30 days of the image captured.

#### **Data Protection**

- All personal data recorded and stored by the CCTV system is governed by the DPA and GDPR.
- Under the GDPR, the Club Administrator is the individual who controls and is responsible for the keeping and use of personal information in manual files or in computerised form.
- The CCTV Administrators (Head Coach and Premises Manager) control images recorded and stored by the CCTV system on behalf of the Management Committee.
- 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 in this policy.
- 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 within a maximum of 30 days.
- Any images that feature other parties will not be disclosed unless all other parties have given signed permission. This includes any on court activity such as coaching or matches.
- Personal data recorded by the CCTV system shall be retained for a maximum of 3 months. Thereafter, it will be deleted automatically.

#### Responsibilities

**CCTV Administrators will:** 

- Ensure that the use of CCTV systems is implemented in accordance with this policy.
- 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.
- Review camera locations and be responsible for the release of any information or material in accordance with this policy.

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- 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 external cameras are non-intrusive in terms of their positions.
- Ensure that recorded material is retained for a period not longer than 3 months 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 Management Committee.
- Ensure that camera control is solely to monitor suspicious behaviour and not individual characteristics.