



# CCTV Policy

March 2024

# **BLTC CCTV policy**

## **Introduction**

Boldon Lawn Tennis Club (BLTC) uses closed circuit television (CCTV) images to protect the club's property and to provide a safe and secure environment for members and visitors to the premises. This policy sets out the details of how BLTC will collect, use and store CCTV images. For more information on your privacy rights associated with the processing of your personal data collected through CCTV images please refer to the BLTC privacy policy.

BLTC's CCTV facility, unless there are exceptional circumstances, will only record images. There is no audio recording i.e. conversations are not recorded on CCTV.

## **Purposes of CCTV**

BLTC has carried out a GDPR data audit and on the basis of its findings it considers it necessary and proportionate to install and use a CCTV system. The data collected from the system will assist in:

- Prevention or detection of crime or equivalent malpractice.
- Identification and prosecution of offenders.
- Monitoring of the security of the clubhouse and surrounding areas within the boundaries of the club
- Ensuring that health and safety rules and BLTC procedures are being complied with.
- Identification of unauthorised actions or unsafe working practices that might result in disciplinary proceedings being instituted against members and employees and to assist in providing relevant evidence.

## **Location of cameras**

Cameras are located at strategic points throughout BLTC's premises, principally at the entrance and exit point, courts 4, 5 and 6 and the kitchen area. BLTC has positioned the cameras so that they only cover communal or public areas within the club's boundaries and they have been sited so that they provide clear images. No camera focuses, or will focus, on toilets, shower facilities or changing rooms.

All cameras are also clearly visible.

Appropriate signs are prominently displayed so that employees, members and other visitors are aware they are entering an area covered by CCTV.

## **Recording and retention of images**

Images produced by the CCTV equipment are intended to be as clear as possible so that they are effective for the purposes set out above. Maintenance checks of the equipment are undertaken on a regular basis to ensure it is working properly and that the media is producing high quality images.

Images are recorded in constant real-time (24 hours a day throughout the year),

As the recording system records digital images, any CCTV images that are held on the hard drive of the system are deleted and overwritten on a recycling basis within 2 months and, in any event, once the hard drive has reached the end of its use, it will be erased prior to disposal.

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Images that are stored on, or transferred on to, removable media such as CDs or which are stored digitally, are erased or destroyed once the purpose of the recording is no longer relevant. In normal circumstances, this will be a period of 12 months]. However, where a law enforcement agency is investigating a crime, images may need to be retained for a longer period.

### **Access to and disclosure of images**

Access to, and disclosure of, images recorded on CCTV is restricted. This ensures that the rights of individuals are retained. Images can only be disclosed in accordance with the purposes for which they were originally collected.

The images that are filmed are recorded centrally and held in a secure location. Access to recorded images is restricted to the Court Com chair, and the Chair and Secretary of the club, who are authorised to view them in accordance with the purposes of the system. Viewing of recorded images will take place in a restricted area to which other members will not have access when viewing is occurring. If media on which images are recorded is removed for viewing purposes, this will be documented.

Disclosure of images to other third parties will only be made in accordance with the purposes for which the system is used and will be limited to:

- The police and other law enforcement agencies, where the images recorded could assist in the prevention or detection of a crime or the identification and prosecution of an offender or the identification of a victim or witness.
- Prosecution agencies, such as the Crown Prosecution Service.
- Relevant legal representatives.
- Management Committee members involved with club disciplinary.

Individuals whose images have been recorded and retained (unless disclosure would prejudice the prevention or detection of crime or the apprehension or prosecution of offenders).

The Chair of the club (or another Management Committee member acting in their absence) is the only person who is permitted to authorise disclosure of images to external third parties such as law enforcement agencies.

All requests for disclosure and access to images will be documented, including the date of the disclosure, to whom the images have been provided and the reasons why they are required. If disclosure is denied, the reason will be recorded.

### **Individuals' access rights**

Under the UK's data protection laws, including the General Data Protection Regulation (GDPR), individuals have the right on request to receive a copy of the personal data that the Company holds about them, including CCTV images if they are recognisable from the image.

If you wish to access any CCTV images relating to you, you must make a written request to the Chair of the club. This can be done by using the club's email address: [boldon.ltc@outlook.com](mailto:boldon.ltc@outlook.com). BLTC will not usually make a charge for such a request, but we may charge a reasonable fee if you make a request which is manifestly unfounded or excessive, or is repetitive. Your request must include the date and approximate time when the images were recorded and the location of the particular CCTV camera, so that the images can be easily located and your identity can be established as the person in the images.

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BLTC will usually respond promptly and in any case within one month of receiving a request. However, where a request is complex or numerous the Company may extend the one month to respond by a further two months.

BLTC will always check the identity of the member making the request before processing it.

The Data Protection Officer will always determine whether disclosure of your images will reveal third party information, as you have no right to access CCTV images relating to other people. In this case, the images of third parties may need to be obscured if it would otherwise involve an unfair intrusion into their privacy.

If BLTC is unable to comply with your request because access could prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

### **Staff training**

BLTC will ensure that all personnel handling CCTV images or recordings are trained in the operation and administration of the CCTV system and on the impact of the laws regulating data protection and privacy with regard to that system.

### **Implementation**

BLTC's Data Protection Officer, Linda Walker, is responsible for the implementation of and compliance with this policy and the operation of the CCTV system and they will conduct a regular review of BLTC's use and processing of CCTV images and ensure that at all times it remains compliant with the laws regulating data protection and privacy. Any complaints or enquiries about the operation of BLTC's CCTV system should be addressed to Linda Walker at [boldon.ltc@outlook.com](mailto:boldon.ltc@outlook.com) or at the address or telephone number below.

### **Data Protection**

The Company will process the personal data collected in connection with the operation of the CCTV policy in accordance with its privacy policy and any internal privacy notices in force at the relevant time. Inappropriate access or disclosure of this data will constitute a data breach and should be reported immediately to BLTC's Data Protection Officer in accordance with BLTC's data protection policy. Reported data breaches will be investigated and may lead to sanctions under BLTC's disciplinary procedure.

### **VENUE DETAILS**

Boldon LTC  
Dipe Lane  
East Boldon  
NE36 0PQ

Tel: 07860 478332