



# CLOSED CIRCUIT TELEVISION (CCTV) POLICY

## Introduction

Eastgate Club (the Club) is committed to the safety of its members and visitors and to the security of its facilities. To support these aims, CCTV is installed internally and externally for the purpose of enhancing the security of the building and its associated equipment, as well as acting as a visible deterrent to crime, vandalism, theft and unsafe activities.

## Scope of Policy

The purpose of this policy is to explain how and why CCTV systems are employed at the Club. It identifies the locations of CCTV systems within the Club and explains how the monitoring, recording and subsequent use of recorded material is managed in a regulated way. This policy applies to all members and visitors to the Club.

## General Principles

The Club Executive Committee has the responsibility for the protection of its buildings, grounds and equipment as well as providing a sense of security to its members, visitors and invitees to its premises. The Club owes a duty of care under the provision of Health & Safety and Welfare legislation. The Club utilises CCTV systems with associated data management systems to support the Executive Committee in achieving these objectives.

CCTV images are captured in public areas and stored responsibly using the propriety Google Nest Cloud. The use of CCTV monitoring within public areas of the Club is limited to security and safety purposes and does not violate the reasonable expectation to privacy as defined by law. Any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

The use of CCTV cameras will be indicated to members and visitors to the Club using clear signage. Data from CCTV system will be accessed and used in accordance with Data Protection law, including the right of access to images captured by CCTV cameras. Clear signage is in place to inform members and visitors of the presence of CCTV systems, including details of how to contact the Data Controller, as well as specifying the purposes for which the CCTV cameras are in place.

CCTV cameras are located in the following areas:

- External: over the main entrance door with partial coverage of the Bowls Green.
- External: over the patio doors leading to the bar area with partial coverage of the patio area and tennis courts.
- Internal: inside the lounge bar with full coverage of the lounge and bar area.
- Internal: the main corridor leading away from the lounge.

## Data Protection

All personal data recorded and stored by the CCTV system is governed by the Data Protection Act. Under the Data Protection Act, a 'Data Controller' is the individual who controls and is responsible

for the keeping and use of personal information. The Data Controller in respect of images recorded and stored by the the Eastgate CCTV system is Mike Brown (Chair of Eastgate Squash) on behalf of the Executive Committee.

The personal data recorded and stored by the CCTV system will only be available to the Data Controller and select Executive Committee members 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, through the Eastgate Club Secretary ([secretary@eastgateclub.co.uk](mailto:secretary@eastgateclub.co.uk)). Requests will be responded to within a maximum of one calendar month.

### **Responsibilities of the DATA Controller**

The Data Controller 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 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 external cameras are non-intrusive in terms of their positions and comply with the principle of “Reasonable Expectation of Privacy”.
- Ensure that recorded material is retained for period no longer that 30 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 Eastgate Club Executive Committee.
- Ensure that camera control is solely to monitor behaviour in and around the club and not individual characteristics.