

Haslemere Tennis Club CCTV Policy

Haslemere Tennis Club operates 24 hour CCTV surveillance via three cameras positioned in its clubhouse and compound.

Purpose

The data recorded by the system will assist in:-

- Providing a safe secure environment for Club members, coaches, contractors and guests.
- Prevention or detection of crime or malpractice.
- Identification and prosecution of offenders or invoking the Club's disciplinary policies.
- Monitor and safeguard the Club's premises, facilities and property.
- Ensuring health & safety and Club rules are being complied with.
- Identification of unauthorised use of the premises, facilities and property
- Identification of unsafe practices.

There is no audio recording i.e. conversations are not recorded on CCTV.

Location of cameras

Cameras are located only in communal areas i.e.

- Above the main entrance gate
- Above the main door to the clubhouse
- Above the door inside the clubhouse.

No cameras are positioned in private areas such as changing rooms or toilets. All cameras are clearly visible. A sign is prominently displayed by the main entrance gate so everyone is aware they are entering an area covered by CCTV.

Recording and retention of images

Images recorded by the CCTV equipment are intended to be as clear as possible, so that they are effective for the purposes set out above. Images can be recorded 24 hours a day and are held on the hard drive for up to 14 days when they are automatically overwritten.

Images recorded and footage will be examined occasionally for maintenance purposes and if the committee have reason to suspect, or have been informed that there may have been:-

- A safety or security concern
- Crime or malpractice
- Misuse or damage to the club's premises, facilities or property.
- Any incident where the recording may prove helpful to the effective management of the club.

Access to and disclosure of images

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

Access to the system is restricted to members of the committee and maintenance contractors. Viewing of recorded images is restricted to members of the committee and people authorised to view the images by the committee.

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:-

- Police and other law enforcement agencies
- Prosecution agencies such as the CPS
- Relevant legal representatives
- Individuals whose images have been recorded, unless disclosure would prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders
- Court Order

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, individuals have the right on request to receive a copy of the personal data that the Club 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 Chairman of the Committee. This can be done by via email at chairman@haslemeretennis.com. The Club 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 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.

The Club will endeavour to respond promptly to any request but as images are only retained on the system for a maximum of 14 days, it may not always be possible to provide images prior to them being automatically overwritten.

The Chairman supported by the Committee 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. If the Club is unable to comply with your request because in its opinion access could undermine or prejudice the prevention or detection of crime or the apprehension or prosecution of offenders, you will be advised accordingly.

Implementation

The Chairman supported by the Committee are 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 the Club's use of 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 the Club's CCTV system should be addressed to chairman@haslmeretennis.com

Data Protection

The Club will process all personal data collected in connection with the operation of the CCTV policy in accordance with the UK General Data Protection Regulation, the Data Protection Act 2018, its Data Protection 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 the Chairman in accordance with the Club's data protection policy. Reported data breaches will be investigated and may lead to sanctions under the Club's disciplinary procedure.

9th June 2022

Appendix 1: Data Protection Impact Assessment

The committee has considered the ICO's guidance regarding the requirements to conduct a Data Protection Impact Assessments (DPIA) prior to installing CCTV. The committee has agreed that following guidance posted on the ICO's website there is no need to conduct a DPIA.

The Club is installing a simple CCTV system, to enhance the safety, security and good management of the Club's property and facilities and the safety and security of its members. It is very unlikely to result in a high risk to individuals. Cameras will only record data images within the Club's premises, there are no cameras in private areas such as changing rooms or toilets and there will be no data captured in public spaces outside of the club. There will be no audio recordings.

The Club's CCTV does not constitute a large scale project, furthermore there will be:-

- No evaluating or scoring of data
- No automated decision making with significant effects
- No systemic monitoring
- No processing of sensitive data or criminal offence data on a large scale
- No processing of sensitive data or data of a highly personal nature
- No processing on a large scale
- No processing of data concerning vulnerable data subjects
- No innovative technological or organisational solutions
- No processing that involves preventing data subjects from exercising a right or using a service or contract
- No systemic or extensive profiling or automated decision making to make significant decisions about people
- No processing special category data or criminal offence data on a large scale
- No systemic monitoring of a publicly accessible plane on a large scale
- No use of innovative technology in combination with any of the criteria in the European guidelines
- No use of profiling, automated decision making or special category data to help make decisions on someone's access to a service, opportunity or benefit
- No carrying out of profiling on a large scale
- No processing of biometric or genetic data in combination with any of the criteria in the European guidelines
- No combining, comparing or matching data from multiple sources
- No processing of personal data without providing a privacy notice directly to the individual in combination with any of the criteria in the European guidelines
- No processing of personal data in a way that involves tracking individuals' online or offline location or behaviour, in combination with any of the criteria in the European guidelines.
- No processing of children's personal data for profiling or automated decision making or marketing purposes or offer online services directly to them
- No processing of personal data that could result in a risk of physical harm in the event of a security breach

The committee will re-evaluate its decision and may carry out a DPIA if there is change to the nature, scope, context or purposes of our data processing.