# Hillside LTC – CCTV Policy

## 1. Scope

Hillside LTC has installed an image-only CCTV surveillance system to protect its clubhouse and main entrance gate. Cameras will be monitored by specific named committee members who have been trained in use of the system.

This Policy has been prepared for the guidance of operators of the CCTV system and for the information of all members of Hillside LTC. Its purpose is to ensure that the CCTV system is used to create a safer environment for club members and visitors to the club, and to ensure that its operation is consistent with the obligations on Hillside LTC imposed by the UK General Data Protection Regulation (GDPR) and good practice guidance issued by the Information Commissioner.

All those within Hillside LTC who are involved in the operation of the CCTV system will be required to have read and understood this Policy.

## 2. Objectives

CCTV has been installed for the following purposes:

- to assist in the prevention and detection of crime;
- to facilitate the identification, apprehension and prosecution of offenders in relation to crime and public order;
- to help ensure safety for the public, club members and visitors;
- to assist with the identification of actions that may result in disciplinary proceedings against club members;
- to provide and operate the system in a manner that is consistent with respect for individual's privacy;

## 3. System

#### 3.1 Coverage

The CCTV system has three cameras. One is focussed on the inside of the clubhouse kitchen door and one is focussed on each of gates near the clubhouse.

#### 3.2 Operation

The CCTV system operates throughout the year for 24 hours a day.

#### 3.3 Presence of CCTV

The public and club members are made aware of the presence of the CCTV system by appropriate signage.

#### 3.4 Privacy

To respect privacy the cameras are fixed and focus only on the areas described in section 3.1 above which does not include any domestic accommodation and this will be demonstrated on request to local residents.

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## 3.5 Recordings, storage and access

Images captured on camera are recorded on a digital hard drive. Only named HLTC committee members will have access to the local recorder which is located in a secure, locked, cabinet.

#### 3.6 General Data Protection Regulations

For the purposes of the General Data Protection Regulations, the Data Controller is Hillside Lawn Tennis Club and it is legally responsible for the management and maintenance of the CCTV system.

## 4. Recording, handling and retention

## 4.1 Monitoring of images

Images captured by the system will be monitored by the Hillside LTC Chairman or the designated backup club member with access to other individuals only given where essential for one of the purposes listed in section 2 of this policy.

#### 4.2 Authorised access

Except in emergencies, only those people on the list below are authorised to have access to the CCTV system or its recordings:

- Hillside LTC Chairman
- Designated backup club member (see section 5.2 below)
- Police and other statutory officers
- TW Electrical Ltd (CCTV system suppliers)
- Members of the public to demonstrate privacy as described in section 3.4 above
- Other individuals to access their personal data as specified in section 4.11 below

#### 4.3 Training

The Hillside LTC Chairman will ensure that all authorised Hillside LTC users are trained in all relevant aspects of the CCTV system.

#### 4.4 Digital recording

All video captured by the CCTV system is recorded onto the hard drive within the Digital Video Recorder (DVR) which is located inside a secure, locked, cabinet.

#### 4.5 Identifying and recording discs and images

Discs, still photographs and printed images will be uniquely identified. All activities relating to each disc - for instance, the date and time of recording, purpose of viewing, the copies taken, whether discs are retained - will be recorded for evidence. For images recorded digitally, all identifying retrieval dates and times will be recorded.

#### 4.6 Retention

Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than two months from the date of recording.

#### 4.7 Erasure and disposal

At the end of their useful life all images on discs will be erased and securely disposed of. All still photographs and hard copy prints will also be disposed of securely.

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#### 4.8 Requests to view or copy images

Requests to view or copy CCTV images will be considered on a case-by-case basis by the Hillside LTC Chairman or designated backup club member and reported to the club committee. If access is denied the reasons will be reported to the next club committee meeting and recorded in the committee minutes.

## 4.9 Copies of recorded images

Copies of tapes or digital images will only be made when required by law or for assistance in diagnosing faults with the system.

## 4.10 Requests from the Police or law enforcement agencies

Requests from the Police or other law enforcement agencies may arise for a number of purposes, including:

- For the prevention or detection of a crime;
- For the apprehension or prosecution of offenders;
- For the purpose of, or in connection with, any legal proceedings (including prospective legal proceedings);
- Is otherwise necessary for the purposes of establishing, exercising or defending legal rights;

All such requests should be directed to the Hillside LTC Chairman or the designated committee member. Law enforcement agencies should provide appropriately authorised data disclosure forms which establish their identity and the purposes for which they require the disclosure.

## 4.11 Rights of individuals

Hillside LTC is obliged to supply individuals (Data Subjects) with their personal data under the UK GDPR. Individuals wishing to access their personal information contained within CCTV images should contact the Hillside LTC Chairman or the designated backup club member.

# 5. Complaints and contacts

## 5.1 Complaints

The Hillside LTC Chairman and designated committee member are responsible for the operation of the CCTV system, and compliance with this Policy. Any concerns in respect of the system's use or regarding breaches of compliance with this Policy should be sent to the club Welfare/Child Protection Officer to be brought to the attention of the club committee who, in turn, will decide on the appropriate action to take which may include the club's disciplinary process if appropriate.

## 5.2 Contacts as at February 2021

Hillside LTC Chairman	Rob Hemmings	Contact via Hillside LTC
Hillside LTC Hon. Secretary	Cathy Kenny	website at www.hillsideltc.org.uk
Designated HLTC backup club member	Fran Caplan-Hinett	

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