



## **RLTC CCTV Policy**

### **Justification for CCTV**

From April 2023, we will be enabling a wider group of members to access the Club facilities by means of a coded Key Safe system. As a result of increasing access to a wider group of members we need to ensure that the Clubhouse is securely locked at night and the relevant security alarm system is activated when the Club is not occupied as this is a condition of our Insurance Policy.

In addition, as we are a volunteer Club and have many hours of the day when the Club is not occupied, we want to ensure that key access points like doors and windows are monitored should an attempted break in occur. The security cameras have therefore been positioned to follow the trail of a potential intruder from car park to entrance gate to windows and doors and eventually to high value areas such as the bar.

We operate a volunteer bar which is controlled by a bar manager. The bar is run by a pre-qualified group of members who have been briefed on the appropriate methods of operation from changing gas, operating glass cleaner and correct use of till and payment system. To ensure the bar is manned by the appropriately trained volunteers we want to monitor the immediate area behind the bar, all bar staff will be informed of the CCTV in place and given the option to decline bar duty if they so wish.

Occasionally, it is reported that there may be an issue at the Club when nobody is in attendance, this could be a leak in a ceiling, floodlights left on, an alarm going off, a possible fire or any other number of situations that may require a remote assessment of the Club. We plan to utilise the CCTV system to assess the seriousness of any such issue quickly and put an action plan in place to resolve. We do not intend to be monitoring the Clubhouse (nor its members) on an ongoing basis, but we wish to assess and respond quickly and efficiently should an issue be reported.

### **CCTV and Members Privacy**

RLTC takes the privacy of its members seriously.

Our aim is to make the Club premises as secure as possible with minimal impact on the privacy of its members, guests and other members of the public entering the Clubs grounds and buildings. We have therefore put the following measures in place:

#### **Lounge and Main Hall**

- No CCTV camera is installed in or near a toilet / changing room and no CCTV camera can capture any data on the entrance/exit of a door to a toilet or changing room.
- All CCTV cameras within public areas of the Clubhouse (lounge bar and main hall) will be considered as passive during normal Clubhouse hours (08:30am – 10pm). They will not be monitored by any individual and no motion alerts will be activated.
- If an incident should occur that requires reviewing of the CCTV coverage, this will be carried out by the designated individual, namely the Data Protection Controller.

- To comply with the terms of the Clubs Insurance policy it may be necessary to do an occasional review of the building during Clubhouse hours (08:30 – 10pm) to ensure the building is securely locked and that the security alarm system is activated. This will be carried out by the Data Protection Controller at a time when they may reasonably expect the Clubhouse to be empty.
- All CCTV cameras within public areas of the Clubhouse (lounge bar and main hall) will be considered as active outside normal Clubhouse hours (10pm – 08:30am). Motion alerts will be activated and reviewed by the designated individual, namely the Data Protection Controller as and when required.
- Anybody entering the Clubhouse, whether it be through the main hall door or bar patio doors will be informed of CCTV in operation using a sticker.
- All CCTV cameras within the public areas of the Clubhouse (lounge bar and main hall) will be muted and will not record sound.

### **Bar/Till Area**

- The CCTV camera within the bar/till area will be considered active to cover motion on the till side of the bar area only. CCTV coverage will only be reviewed by the designated individual, namely the Data Protection Controller as and when an issue is raised, and it is deemed appropriate to review.
- Anyone standing on the lounge side of the bar area will not be recorded.
- Any member who enters the till side of the bar area will be notified of the CCTV in operation using a sticker on the entry door.
- Any member working on the till side of the bar will also be informed of the CCTV in operation by the Bar Manager or Data Protection Controller and given the option to decline working behind the bar should they wish to do so.
- All CCTV cameras within the bar/till area will be muted and will not record sound.

### **Exterior Cameras**

- Exterior cameras will be considered active throughout the day. They will record activity on the approach to the Club and within the grounds of the Club, but they will only be reviewed (except door/lobby entrance camera) by the designated individual, namely the Data Protection Controller should an incident arise.
- The door/lobby entrance camera will be reviewed from time to time by the Data Protection Controller to ensure the key fob entry system is being accessed by appropriate individuals in a manner considered acceptable to RLTC.
- All exterior cameras will be muted and will not record sound.

### **CCTV Recordings and right of access**

- Any recording of activity will be held for a maximum 7-day period.
- Any individual has the right to request copies of video recordings of themselves (should they exist) by contacting the Data Protection Controller.
- Any recording will be held securely by the Data Protection Controller and accessed by appropriate password protected software and for 7 days unless an incident should occur that requires it to be stored for longer.
- Any recording that is considered relevant / of interest by the police or any other appropriate authority will be handed over for their appraisal.

This policy has been developed following recommendations and guidance notes published by the ICO (Information Commissioner's Office). If any person has concerns regarding the application of this

policy, they should discuss with the Data Protection Controller who will attempt to resolve any concerns or contact the Information Commissioners Office for further guidance.

To contact the Data Protection Controller please email [info@radyrtennis.co.uk](mailto:info@radyrtennis.co.uk) or contact RLTC Chairman direct.

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