

# HEADSTONE LAWN TENNIS CLUB CLOSED CIRCUIT TELEVISION (CCTV) POLICY

## Introduction

Headstone Lawn Tennis Club uses closed circuit television (CCTV) images to protect the Club's property and to provide a safe and secure environment for employees and visitors to the Club premises. This policy sets out the details of how the Club 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 Club's privacy notice and data protection policy.

The Club's CCTV facility will only record images. There is no audio recording i.e. conversations are not recorded on CCTV.

## Purposes of CCTV

The Club has carried out a data protection impact assessment and on the basis of its findings it considers it necessary and proportionate to 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 Club's business premises.

## Location of Cameras

Cameras are located at strategic points throughout the Club's premises. The Club has positioned the cameras so that they only cover communal or public areas on the Club's premises 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 clearly visible.

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

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.

Images may be recorded either in constant real-time (24 hours a day throughout the year), or only at certain times, as the needs of the Club dictate.

## **Monitoring procedures**

In normal circumstances footage will be kept for up to 12 weeks on the hard drive. 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 authorised personnel identified by the Management Committee.

Viewing of recorded images will take place in a restricted area to which other individuals will not have access when viewing is occurring.

If media on which images are recorded are 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.
- 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).

Authority to disclose images to external third parties such as law enforcement agencies will be made by the Club Management Committee.

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.

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 Club holds about them, including CCTV images if they are recognisable from the image.

## **Individuals' access rights**

If you wish to access any CCTV images relating to you, you must make a written request to the Club Secretary. This can be done by using this email address:  
info@headstonetennisclub.co.uk.

The Club will usually not make a charge for such a request, but we may charge a reasonable fee if you make a request which is manifestly unfounded, excessive or is repetitive. Your request must include the date and approximate time when the images were recorded and 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 usually respond promptly and in any case within one month of receiving a request.

However, where a request is complex or numerous the Club may extend the one month to respond by a further two months.

The Club will always check the identity of the person making the request before processing it.

The Club Management 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. 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 the Club 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.

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