

CCTV Policy

Initial Date of Policy: 11th July 2024

Last Update: -

We use CCTV at Hampton in Arden Sports Club. We believe that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all our staff, members and visitors. However, we recognise that this may raise concerns about the effect on individuals and their privacy. This policy is intended to address such concerns. Images recorded by surveillance systems are personal data which must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and ensuring that the legal rights of staff and members, relating to their personal data, are recognised and respected.

Definitions

For the purposes of this policy, the following terms have the following meanings:

CCTV: means fixed and domed cameras designed to capture and record images of individuals and property.

Privacy Statement: The Hampton in Arden Sports Club privacy statement found on this website.

Surveillance system: Systems and software applications designed to monitor or record images of individuals or information relating to individuals. Access is controlled by valid user accounts.

Policy

We currently use CCTV cameras to view and record individuals in our Clubhouse. This policy outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice.

We recognise that information that we hold about individuals is subject to data protection legislation. The images of individuals recorded by CCTV cameras are personal data and therefore subject to the legislation. We are committed to complying with all our legal obligations and seek to comply with best practice suggestions from the Information Commissioner's Office (ICO).

This policy covers all our staff, members and visiting members of the public, workers and contractors.

This policy will be regularly reviewed to ensure that it meets legal requirements, relevant guidance published by the ICO and industry standards.

Reasons for the use of CCTV

We currently use CCTV as outlined below. We believe that such use is necessary for legitimate purposes, including:

1. to comply with our licencing conditions;
2. to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
3. for the personal safety of staff, members, visitors and other members of the public and to act as a deterrent against crime;
4. to support law enforcement bodies in the prevention, detection and prosecution of crime;
5. to assist in day-to-day management, including ensuring the health and safety of staff, members and others; or
6. to assist in the effective resolution of disputes.

This list is not exhaustive and other purposes may be or become relevant.

Monitoring

- Images are monitored by authorised personnel when required pursuant to the Reasons for the use of CCTV given above.
- Members (usually board members of Hampton in Arden Sports Club) using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

How we will operate any CCTV

- Where possible, we will display signs at the entrance of the surveillance zone to alert individuals that their image may be recorded.
- We will ensure that live feeds from cameras and recorded images are only viewed by approved members (usually board members of Hampton in Arden Sports Club) whose role requires them to have access to such data. Recorded images will only be viewed in designated, secure places.
- Only video images will be recorded. Audio will not be recorded.

Use of data gathered by CCTV

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This is done by the Surveillance system that we use.

Retention and erasure of data gathered by CCTV

Data recorded by the CCTV system will be stored. Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough only for incidents to come to light. In all other cases, recorded images will be kept for no longer than 90 days.

Requests for disclosure

- No images from our CCTV cameras will be disclosed to any other third party, without express permission being given by our data protection officer (who's details can be found in our Privacy Statement) (DPO). Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.
- In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.
- We will maintain a record of all disclosures of CCTV footage.
- No images from CCTV will ever be posted online or disclosed to the media.

Subject access requests

- You may make a request for disclosure of your personal information in accordance with our Privacy Statement.
- In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.
- We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.