

CCTV & Data Management

Purpose of Policy

The purpose of this policy is to regulate the use of Closed Circuit Television in the monitoring of the club premises under the remit of the Committee

Purpose of CCTV Systems

The Park Tennis Club is committed to ensuring as far as possible a safe, secure and friendly environment for members and visitors. CCTV images are captured in public areas and stored responsibly, for this purpose and to meet the requirements of our bar licence.

Scope of Policy

This policy applies to all members of and visitors to The Park Tennis Club and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.

General Principles

The Park Tennis Club Committee has the responsibility for the protection of its property and plant and equipment as well as providing a sense of security to its members, visitors and invitees to its premises. The Park Tennis Club utilises CCTV systems as a mode of security and surveillance for the purpose of enhancing the quality of the environment at the Club.

The primary aim of CCTV monitoring of Club premises is to deter crime and vandalism and to assist in the protection and safety of the premises and its associated equipment and materials in the interests of members.

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

Information obtained through video monitoring may only be released when authorized by the Data Controller or CCTV System Administrator following consultation with the Committee.

Video monitoring of public areas, for security purposes within the said establishment is limited to uses that do not violate the reasonable expectation to privacy as defined by law.

The use of CCTV cameras will be indicated to members and visitors to the Club by signage stating "CCTV in operation – Images are being monitored and recorded for the purposes of crime prevention, public safety and ensuring adherence to Club rules". Data from CCTV system will be accessed and used in accordance with Data Protection law.

Cameras are located in the entrance area, clubhouse and around the courts.

Members and visitors will be informed of the existence and purposes of the CCTV system as outlined above. The right of access to images captured by CCTV cameras shall be in accordance with the Data Protection law.

Data Protection

All personal data recorded and stored by the CCTV system is governed by the Data Protection Act. Under the Data Protection Act, a 'Data Controller' is the individual who controls and is responsible for the keeping and use of personal information in manual files or in computerised form. The Data Controller in respect of images recorded and stored by the CCTV system is the Club Chairman on behalf of the Management Committee.

The personal data recorded and stored by the CCTV system will only be available to the Data Controller and Park Tennis Club Committee and will be used only for the purposes outlined in this policy.

Individuals whose images are recorded and stored by the CCTV system shall have the right to request and receive a copy of personal data processed by the system. Such requests shall be made in writing to the Data Controller and shall be complied within a maximum of 40 days.

Personal data recorded by the CCTV system shall be retained for a maximum of 35 days. Thereafter, it will be deleted automatically.

Responsibilities:

The Data Controller supported by the System Administrator will:

- Ensure that the use of CCTV systems is implemented in accordance with this policy
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within the Club.
- Ensure that all existing CCTV monitoring systems will be evaluated for compliance with this policy
- Review camera locations and be responsible for the release of any information or material in compliance with this policy.
- Maintain a record of the release of discs or any material recorded or stored in the system.
- Ensure that material is not duplicated for release.
- Ensure that external cameras are non-intrusive in terms of their positions and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that recorded material is retained for period not longer than 35 days and will then be erased unless required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Park Tennis Club Committee
- Ensure that camera control is solely to monitor behaviour in and around the club and not individual characteristics.