

<p style="text-align: center;">WINDSOR TENNIS CLUB POLICY ON CCTV & DATA MANAGEMENT</p>

PREPARED BY:

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POLICY VERSION CONTROL:

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0.1	27/1/2022	RH/GOR	Draft Issue
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1.0	8/2/2022	GOR	Council Approved

NOTE

Closed Circuit Television System (CCTV) is installed in Windsor Tennis Club under the remit of the Council as elected at the AGM

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PURPOSE OF POLICY

The purpose of this policy is to regulate the use of Closed Circuit Television and its associated technology in the monitoring of the internal and external environs of the premises under the remit of the Windsor Tennis Club Council.

PURPOSE OF CCTV SYSTEMS

CCTVs are installed internally and externally in the premises for the purpose of enhancing security of the building and its associated equipment as well as creating a mindfulness among the occupants, at any one time, that a surveillance security system is in operation to deter bullying, crime, vandalism and theft, as an aid to Health & Safety and to the discharge of Windsor Tennis Club Council's duty of care within and/or in the external environs of the premises during both the daylight and night hours each day.

SCOPE OF POLICY

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

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GENERAL PRINCIPLES

Windsor Tennis Club Council has the responsibility for the protection of its property, equipment and other plant and equipment as well as providing a sense of security to its employees, members, visitors and invitees to its premises. Windsor Tennis Club owes a duty of care under the provision of Health & Safety and Welfare legislation and utilises CCTV Systems and its associated monitoring and recording equipment as an added mode of security and surveillance for the purpose of enhancing the quality of life of Windsor Tennis Club by integrating the best practices governing the surveillance of its premises.

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

Monitoring for security purposes will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies and personnel for other purposes is prohibited by this policy, e.g. CCTV monitoring of employees and/or member evaluations would undermine the acceptability of the resources for use regarding critical safety and security objectives and is therefore prohibited by this policy.

Information obtained through video monitoring may only be released when authorised by the data controller following consultation with the Council.

CCTV monitoring of public/club areas, for security purposes, will be conducted in a manner consistent with all existing policies adopted by the Council including Child Protection, Bullying & Harassment in the Workplace Policy, Sexual Harassment Policy and other relevant policies including the provisions set down in Equality and other related legislation.

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The industry code of practice for video monitoring prohibits monitoring based on the characteristics and classifications contained in Equality and other related legislation eg. Race, Gender, Sexual Orientation, National Origin, Disability etc.

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 Council will periodically provide written material describing the purpose and location of CCTV monitoring and guidelines for its use. The location of outdoor CCTV cameras will also be indicated to the members. Data from the CCTV system will be accessed and used in accordance with Data Protection Regulations.

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Cameras are located in the following INTERNAL areas:

- Reception area
- Function Room
- Corry Hall
- Squash Courts
- Gym

Cameras are located in the following EXTERNAL areas:

- Entrance barrier
- Car Park
- Entrance Gate
- Dome
- Balcony overlooking courts

Signage will be erected in each location in which a camera is located. Each sign will display text of the form:

“CCTV in Operation for Health, Safety and Security”

A further sign will be displayed in the clubhouse which will include the name and contact of the data controller as well as the specific purposes for which the CCTV camera is in place in each location, for example:

- CCTV in Operation – Images are being monitored and recorded for the purposes of crime prevention, public safety and ensuring adherence to club rules
- To deter/detect bullying
- To deter/detect crime, theft and vandalism
- To ensure compliance with court booking rules
- To ensure compliance with Child Protection Policy
- As an aid to security

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- For Health & Safety purposes
- To assist with access control to the club
- To enable the Council to discharge its duty of care

Staff, members and parents/guardians will be informed of the existence and purposes of the CCTV system as outlined. The right of access for members and staff to images captured by CCTV cameras shall be in accordance with the Data Protection Acts 1998 & 2003 as outlined below. It is important that any visually impaired members and visitors are made aware that CCTV is in operation and the reasons for it.

DATA PROTECTION REGULATION

All personal data recorded and stored by the CCTV system is governed by the EU – GDPR Act and UK legislation. Under the EU-GDPR, a Data Controller, is the individual or the legal person 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 in the club is: Greg O’Rawe (Chairman) on behalf of the Council, and in his absence Dermot MacCann (Honorary Treasurer) will assume the role of Data Controller.

The personal data recorded and stored by the CCTV system will only be available to the Data Controller and will be used for the purposes as outlined on the signage. The CCTV system shall not be used to monitor staff performance or conduct.

Individuals whose images are recorded and stored by the CCTV shall have the right to request and receive a copy of personal data processed by the system (Subject Access Request). Such requests shall be made in writing to the Data Controller and shall be complied within a maximum of one month (or 30 days) (Section 91.2).

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Personal data recorded by the CCTV system shall be retained for a maximum of 28 days, thereafter, it be be automatically deleted.

The recorded footage shall be securely stored in a locked store. Unauthorised access to that area is not permitted at any time. The area is locked when not occupied and the key controlled.

The following procedures shall be followed in the event that the Police (PSNI) seeks to view or take a copy of CCTV footage from the Clubs CCTV system.

- 1. The Data Controller shall be satisfied that there is an investigation underway by telephoning the PSNI station and speaking to the Duty Sergeant or available higher-ranking officer.**
- 2. A request from the PSNI must be made in writing on PSNI headed paper.**

All CCTV systems and associated equipment will be required to be compliant with this policy following its adoption by the Council.

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RESPONSIBILITIES

The Data Controller will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by the Council
- Oversee and co-ordinate the use of CCTV monitoring for Health & Safety and Security purposes within the club
- Ensure that all CCTV monitoring systems will be evaluated for compliance with its policy
- Ensure that the CCTV monitoring at Windsor Tennis Club is consistent with the highest standards and protections
- Ensure that the CCTV monitoring systems are regularly checked to ensure they are fully operational and details of such checks are recorded in a log book
- 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 on the system
- Ensure that material is not duplicated for release
- Ensure that the perimeter views from fixed location cameras conform with this policy both internally and externally
- Provide a list of the CCTV cameras and the associated monitoring equipment and the capabilities of such equipment located in the club to the Council for formal approval

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- Approve the location of temporary cameras to be used during special events that have particular security requirements and approve the location of temporary cameras to be used during special events that have particular security requirements and ensure their withdrawal following such events

NOTE: Temporary cameras does not include mobile video equipment or hidden surveillance cameras used for criminal investigations

- Give consideration to, and refer to the Council, both members and staff petitions regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV or associated equipment
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the club and be mindful that no such infringement is likely to take place
- Advise the Council to ensure that adequate signage, at appropriate and prominent locations is displayed and included the following in such signage:

“CCTV in Operation for Health, Safety and Security”

- Ensure that external cameras are non-intrusive in terms of their positions and views of residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that camera control is not in breach of the intrusion on intimate behaviour by persons in public areas
- Ensure that the recorded material is retained for a period not longer than 28 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 Council.
- Ensure that camera control is solely to monitor suspicious behaviour and not individual characteristics

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- Ensure that mobile video equipment will only be used for criminal investigations and with the approval of the Council and the PSNI.
- Delegate, as appropriate, the viewing of "recorded" images to another individual, for specific reasons in line with this policy and its restrictions, with any such delegation being recorded in a log book.