

# **City of Peterborough Sports Club**

## **CCTV Policy**

Version 2  
Updated April 2023

## 1. Background

- 1.1 City of Peterborough Sports Club uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the Sport Club buildings and outside spaces in order to provide a safe and secure environment for members, staff and visitors, and to prevent the loss or damage to club property.
- 1.2 CCTV surveillance at the Club is intended for the purposes of:
  - protecting the Club buildings and Club assets, both before, during and after Club opening hours
  - assisting the Club's Safeguarding Officers in investigations into safeguarding complaints against any member, staff or visitor
  - ensuring the health and safety of staff, members, parents and visitors
  - reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
  - supporting the Police in a bid to deter and detect crime
  - assisting in identifying, apprehending and prosecuting offenders
  - ensuring that the Club policies are respected so that the Club can be properly managed
- 1.3 The system comprises of multiple fixed cameras with current locations as listed in Appendix A
- 1.4 The CCTV system is owned and operated by the Club and its deployment is determined by the Club's Management Council. It is serviced as required to ensure its successful operation by Thistle Security, who installed the system
- 1.5 The CCTV is monitored centrally from the Club Office by the Sports Club Manager and is also on the Sports Club Manager tablet and those of up to 3 other nominated Management Council members designated as backup in case access is needed out of office hours or during holidays. In case of emergency or to provide extra holiday cover, the Chairman, any Director or the Secretary may approve an additional Council member to install the app on a temporary basis.
- 1.6 The Club's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the Club's use of CCTV and how it complies with the Act.
- 1.7 All authorised staff with access to images are aware of the procedures that need to be followed when accessing the recorded images. All staff are aware of the restrictions in relation to access to, and disclosure of, recorded images.
- 1.8 The Club complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.
- 1.9 The use of the CCTV system 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 e.g. CCTV will not be used for monitoring employee performance.
- 1.10 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the Club, including all Safeguarding policies for each section of the Club and guidance and advice from the relevant governing bodies, as well as relevant legislation.

## 2. Justification for Use of CCTV

- 2.1 The use of CCTV to monitor the Club buildings, car park and outside space for security purposes has been deemed to be justified by Management Council. The system is intended to capture images of intruders or of individuals (which may include members or staff) damaging property or removing goods without authorisation, of anti- social behaviour or any act which may cause a breach of the licensing laws which apply to the club.
- 2.2 The system may also be used to provide evidence where a potential Safeguarding issue has been identified.
- 2.3 CCTV systems will not be used to monitor normal staff or member activity in any part of the Club.

## 3. Data Protection Impact Assessments

- 3.1 Where any additional CCTV cameras are to be installed, the Club will carry out a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation.
- 3.2 Where existing CCTV systems are in operation as of May 2018, the Club will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system.

## 4. Location of Cameras

- 4.1 Cameras will be sited so they only capture images relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.
- 4.2 The Club will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The Club will make every effort to position cameras so that their coverage is restricted to the Club premises, which can include both indoor and outdoor areas.
- 4.3 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify (changing room, showering area or toilets). City of Peterborough Sports Club has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.
- 4.4 Cameras placed so as to record external areas are positioned in such a way as to prevent as far as possible any recording of passers-by or of adjoining property.
- 4.5 CCTV Video Monitoring and Recording of Public Areas may include the following:
  - **Protection of Club buildings and property:** The building's perimeter, entrances and exits, lobbies and corridors, special storage areas, office locations, receiving areas for goods/services, external storage areas, tennis courts (indoor and outdoor) and the Astroturf hockey pitch
  - **Monitoring of Access Control Systems:** Monitor and record restricted access areas at entrances to buildings and other areas
  - **Verification of Security Alarms:** Intrusion alarms, exit door controls, external alarms
  - **Criminal Investigations (carried out by police):** Robbery, burglary, vandalism, assault and theft surveillance
  - **Safeguarding :** Reports of any safeguarding issue involving a member or employee of the club or visitor to the Club
- 4.6 A list of the cameras including what their range of view is attached as Appendix A. This list will be updated if cameras are moved or more cameras are deployed, agreed by Management Council and subject to relevant risk assessment

## **5. Covert Surveillance**

5.1 City of Peterborough Sports Club will not engage in covert surveillance.

## **6. Notification**

6.1 A copy of this CCTV Policy will be provided on request to staff, members, parents and visitors to the Club and will be made available on the Club website to members when practical

6.2 Adequate signage will also be prominently displayed at various points around the City of Peterborough Sports Club property to indicate that CCTV is in use. Signage at the entrance to the main buildings will include the name and contact details of the data controller

6.3 New employees will be advised of the position of any camera which relates directly to the part of the site in which they work as part of their general induction process. All employees will be advised of any changes to siting or additional cameras set up after their initial induction.

## **7. Storage and Retention**

7.1 The images captured by the CCTV system will be retained as defined on the system, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue where they will be shared with lawyers, police or governing bodies of sport as appropriate.

7.2 The images/recordings will be stored in a secure environment with a log of access including authorisations where the access is deemed to need it e.g. relates to safeguarding, or a member or employee of the club may be involved.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Chairman of Management Council. The Chairman of Management Council may delegate the administration of the CCTV System to another staff member or member of Management Council.

7.4 In certain circumstances, the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. If an employee or member is involved they will be invited to view the recording in the presence of 2 members of Management Council which may include the Sports Club Manager.

## 8. Access

- 8.1 Recorded footage and the monitoring equipment will be securely stored in the Club office. Unauthorised access to that area will not be permitted at any time. The area will be locked when not occupied by authorised personnel. A log of access to footage will be maintained.
- 8.2 Access to the CCTV system and stored images will be restricted to authorised personnel only.
- 8.3 When accessing images in a case which requires authorisation two authorised members of staff or Management Council must be present. A written record of access will be made. Records of access will be kept. If in an emergency a single person needs to access footage (e.g. a police request out of office hours), a second person must also view it as soon as possible and the nature of the emergency will be logged on the access log. These logs will be kept for up to 3 years.
- 8.4 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge. These logs will be kept for up to 3 years. Under ICO rules, requests deemed frivolous will be refused.
- 8.5 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage. If other members are involved and viewing would breach their privacy, a description of the footage will be provided.
- 8.6 In relevant circumstances, CCTV footage may be accessed:
- By the police where City of Peterborough Sports Club (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
  - Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on City of Peterborough Sports Club property, or
  - To the HSE and/or any other statutory body charged with child safeguarding; or
  - To assist the Chairman in establishing facts in cases of unacceptable member behaviour, in which case, the parents/guardians will be informed if a junior is the subject of the case; or
  - To assist the Chairman in establishing facts in cases of unacceptable behaviour by an employee or member of staff; or
  - To data subjects (or their legal representatives), pursuant to a Subject Access Request or
  - To individuals (or their legal representatives) subject to a court order.
  - To the Club insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

## **9. Subject Access Requests (SAR)**

- 9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.
- 9.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.
- 9.3 The Club will respond to requests within 30 calendar days of receiving the request in line with the Club's right of access policy. Complex requests may be extended to 3 months in line with ICO guidance.
- 9.4 The Club reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.
- 9.5 A record of the date of the disclosure along with details of who the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.
- 9.6 In giving a person a copy of their data, the Club may provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released. Where footage contains images relating to 3<sup>rd</sup> parties, the Club will take appropriate steps to mask and protect the identities of those individuals if possible. If not, they will seek permission to release the footage from the individuals concerned. If that permission is not granted, the footage will be described but not released.

## **10. Complaints**

- 10.1 Complaints and enquiries about the operation of CCTV within the Club should be directed to the Chairman of Management Council in the first instance.

## **11. Staff Training (relates to staff/Council members authorised to access the system)**

- 11.1 Staff system will be trained to comply with this policy. Staff will understand that all information relating to the CCTV images must be handled securely.
- 11.2 Staff will receive appropriate training to enable them to identify and handle different requests according to regulations.

## 12. Responsibilities

### 12.1 The Chairman of Management Council will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by City of Peterborough Sports Club
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within City of Peterborough Sports Club
- Ensure that all existing CCTV monitoring systems are evaluated for compliance with this policy
- Ensure that the CCTV monitoring at City of Peterborough Sports Club is consistent with the highest standards and protections
- Review camera locations and be responsible for approving the release of any information or recorded CCTV materials stored in compliance with this policy
- Ensure a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system is maintained
- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Give consideration to both members and staff feedback/complaints regarding possible invasion of privacy or confidentiality due to the location of a particular CCTV camera 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
- Co-operate with the Health & Safety Officer of City of Peterborough Sports Club in reporting on the CCTV system in operation in the Club
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of "Reasonable Expectation of Privacy"
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- Ensure that camera control is solely to monitor suspicious behaviour, criminal damage etc. and not to monitor individual characteristics
- Ensure that camera control is not infringing an individual's reasonable expectation of privacy in public areas

## Appendix 1

### CCTV Cameras @ CoPSC

1. Car Park 1 - Main car park from building
2. Compound - Side of building looking over bin store & path
3. Hockey Pitch - Side of building looking towards astro
4. Front patio (L) - Front patio, astro side
5. Front Patio (R) - Front patio, changing room side
6. Foyer 1 - Inside hall view towards main entrance
7. Lounge area - Lounge view towards bar from patio doors
8. Squash corridor - Inside corridor with stairs up to squash balcony
9. Tennis patio - Tennis patio & outside courts
10. Indoor tennis (court 4) - Indoor tennis court nearest patio
11. Gravel car park – Gravel car park from fence on grass side towards main car park
12. Behind Bar – Bar from kitchen access towards cellar door
13. Squash balcony – from end nearest court 3&4 along whole corridor including stairwell
14. Foyer 2 - Inside hall view from main entrance towards doors to squash courts
15. Cellar – cellar from bar towards outside door
16. Indoor tennis (Court 5) - Indoor tennis court furthest from patio including 2 fire doors
17. Squash Court 5 entrance - Corridor from fire exit by shop
18. Squash court 5 seating area - Glass back steps from bottom
19. Squash court 5 - Glass back from top of steps
20. Tractor shed – across grass area with containers from end of clubhouse
21. Kitchen – from above door across to entrance to bar
22. Office – internal view from above CCTV control across whole office
23. Entrance door – above door looking directly down at entrance
24. Bar Entrance – Lounge from main entrance across to patio side
25. Camera 25 – Balcony above squash courts from clubhouse end including stairwell
26. Camera 26 – Door to squash court 5 corridor between entrance to courts 3 & 4

List updated 27<sup>th</sup> March 2023



**Appendix 2**

**CCTV Monitoring log (example)**

Anyone looking at CCTV should complete this form.

If the review is subject to authorisation, a second person from Management Council must also be present and their details recorded.

<b>Date</b>	<b>Time</b>	<b>1<sup>st</sup> Viewer</b>	<b>Authorised by</b>	<b>2<sup>nd</sup> viewer (if required)</b>	<b>Reason for view</b>