

Unit 1, Ellesmere Crescent  
Haydn Road,  
Sherwood NG5 1DX  
Phone: 0115 837 4180  
Email: info@robinhoodgymnastics.co.uk

# **CCTV Policy Robin Hood Gymnastics Centre.**

## **Reviewed Oct 2023**

A Closed Circuit Television System (CCTV) is now installed at RHGC at Unit 1, Ellesmere Business Park, Nottingham NG51DX under the remit of the Board of Directors / Management.

### **PURPOSE OF THE POLICY**

The purpose of this policy is to regulate the use of CCTV and its associated technology in the monitoring of both the internal and external environs of the premises under the remit of the Board of Directors.

A CCTV system is installed both internally and externally on 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 within and/or in the external environs of the premises during both the daylight and night hours each day. CCTV surveillance at the Centre is intended for the purposes of:

- protecting the centres buildings and centres assets, both during and after opening hours.
- promoting the health and safety of staff, participants and visitors.
- preventing bullying; investigating possible incidences and protecting the welfare of all members, visitors and staff.
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
- supporting a bid to deter and detect crime.
- assisting in identifying, apprehending and prosecuting offenders.
- ensuring that the centre rules are respected by staff, members and visitors so that the centre can be properly managed and identify possible changes needed for the improvement of the welfare of all.

### **SCOPE**

This policy relates directly to the location and use of CCTV and the monitoring, recording and subsequent use of such recorded material.

## GENERAL PRINCIPLES

The Board of Directors has a statutory responsibility for the protection of Centres property and equipment as well as providing a sense of security to its employees, members and invitees to its premises.

RHGC owes a duty of care under the provisions of Safety, Health and Welfare at Work Act 2005 and associated legislation and utilises the CCTV system 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 the Centre and Community by integrating the best practices governing the public and private surveillance of its premises.

The primary aim of the CCTV system is to deter crime and vandalism and to assist in the protection and safety of the said property and its associated equipment and materials.

There are many legitimate and lawful business reasons why employers can monitor employees using CCTV. These include:

- to keep employees safe and secure by preventing violence or theft;
- to prevent pilfering, malingering, deliberate damage or other misconduct;
- to ensure and record that health and safety procedures are being followed;
- to monitor and improve productivity;
- to comply with regulatory requirements in some sectors (e.g., financial services).

However, this not considered the primary aim for RHGC. 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.

Information obtained through the CCTV system may only be released when authorised by the Directors, following consultation with the management and senior staff.

CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the Board and Management.

This policy prohibits monitoring based on the characteristics and classifications contained in equality and other related legislation e.g., race, gender, sexual orientation, national origin, disability etc. Video monitoring of public areas for security purposes within the premises is limited to uses that do not violate the individual's reasonable expectation to privacy.

Information obtained in violation of this policy may not be used in a disciplinary proceeding against an employee.

All CCTV systems and associated equipment will be required to be compliant with this policy. Recognisable images captured by CCTV systems are 'personal data'. They are therefore subject to the provisions of the Data Protection Acts 1988 and 2003.

## **JUSTIFICATION FOR USE OF CCTV**

Section 2(1)(c)(iii) of the Data Protection Act requires that data is '*adequate, relevant and not excessive*' for the purpose for which it is collected. This means that the Board of Directors and The Operations Management needs to be able to justify the obtaining and use of personal data by means of a CCTV system. The use of CCTV on the outside of the building for security purposes has been deemed to be justified by the Board of Directors and Management. The system is intended to capture images of intruders or of individuals damaging property or removing goods without authorisation.

## **LOCATION OF CAMERAS**

The location of cameras is a key consideration. Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify. [There will be no CCTV in the staff room, private offices or changing and party room areas]. The Board has endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals. Cameras placed so as to record external areas are positioned in such a way as to prevent or minimise recording of passers-by or of another person's private property.

CCTV Video Monitoring and Recording of Public Areas

- Protection of buildings and property
- Verification of Security Alarms: Intrusion Alarms, exit door controls, external alarms
- Video Patrol of Public Areas: Parking areas, main entrance/reception/ kitchen and main gym.
- Criminal Investigation, robbery, burglary and theft surveillance.

## **NOTIFICATION – SIGNAGE**

The Managing Director will provide a copy of this CCTV policy on request to staff, parents and visitors to the centre. This policy describes the purpose and location of CCTV monitoring, a contact number for those wishing to discuss CCTV monitoring and guidelines for its use. The location of CCTV cameras will also be indicated to the Board or Management. Adequate signage will be placed at each location in which a CCTV camera is sited to indicate that CCTV is in operation.

## **STORAGE & RETENTION**

Section 2(1)(c)(iv) of the Data Protection Act states that data '*shall not be kept for longer than is necessary*' for the purposes for which it was obtained. A data controller needs to be able to justify this retention period. For a normal CCTV security system, it would be difficult to justify retention beyond a month (28 days), except where the images identify an issue – such as a break-in or theft and those particular images/recordings are retained specifically in the context of an investigation/prosecution of that issue.

Accordingly, the images captured by the CCTV system will be retained for a maximum of 28 days, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue.

The images/recordings will be stored in a secure environment with a log of access kept. Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV system is the responsibility of the Managing Director.

## **ACCESS**

Tapes/DVDs storing the recorded footage and the monitoring equipment will be securely stored in a restricted area. 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 tapes/images will be maintained.

Access to the CCTV system and stored images will be restricted to authorised personnel only.

In relevant circumstances, CCTV footage may be accessed:

- where The Board of Management of RHGC are required by law to make a report regarding the commission of a suspected crime; or
- Following a request when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on school property, or
- To the HSE and/or any other statutory body charged with child safeguarding; or
- To assist the management in establishing facts in cases of unacceptable members, staff, visitors behaviour, in which case, the staff involved, welfare officers and parents/guardians will be informed; or
- To data subjects (or their legal representatives), pursuant to an access request where the time, date and location of the recordings is furnished to The Board or Management.
- To individuals (or their legal representatives) subject to a court order.
- To the insurance company where the insurance company requires same in order to pursue a claim for damage done to the insured property.

Requests for Information obtained through video monitoring will only be released when authorised by the Board of Management.

Access requests: On written request, any person whose image has been recorded has a right to be given a copy of the information recorded which relates to them, provided always that such an image/recording exists i.e. has not been deleted and provided also that an exemption/prohibition does not apply to the release.

Where the image/recording identifies another individual, those images may only be released where they can be redacted/anonymised so that the other person is not identified or identifiable.

To exercise their right of access, a data subject must make an application in writing to Board. RHGC may charge up to £12.00 for responding to such a request and must respond within 40 days.

Access requests can be made to the Operations Manager.

A person should provide all the necessary information to assist RHGC in locating the CCTV recorded data, such as the date, time and location of the recording. If the image is old such poor quality as not to clearly identify an individual, that image may not be considered to be personal data and may not be handed over by the Centre.

All RHGC policies are consistent with one another, within the framework of the overall Centre Plan. Relevant policies already in place, being developed or reviewed, are examined with reference to the CCTV policy and any implications which it has for them are addressed.

The following policies are among those considered:

- Privacy policy
- Safeguarding policy
- Code of conduct
- Dignity and Respect policy

- Complaints Procedure
- Fees policy
- Health and Safety
- Handbook for parents

The CCTV policy has been developed mindful of the Centre's obligation under Data Protection Legislation.

### **IMPLEMENTATION ARRANGEMENTS, ROLES AND RESPONSIBILITIES**

The Directors and Operations Manager are assigned the role of co-ordinating the implementation of this CCTV policy and for ensuring that all participants of the Centre community are familiar with the policy.

Ratification & Communication

### **IMPLEMENTATION & REVIEW**

The policy will be reviewed and evaluated from time to time. On-going review and evaluation will take cognisance of changing information or guidelines.

Practical indicators that will be used to gauge the impact and effectiveness of the policy will include the extent to which:

- Staff and parents/guardians are aware of the policy
- Requests for access to personal data are dealt with effectively
- Personal data records are held securely
- Personal data records are retained only for as long as necessary

Signed:

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Managing Director

Dated: