



Introduction

The purpose of this Policy is to regulate the management, operation, and use of the Closed-Circuit Television (CCTV) system at Westcliff Lawn Tennis Club (the “Club”).

The CCTV system consists of four (4) static cameras located in the following areas:

- Car Park
- Pedestrian Access to the Club
- Main Courts
- Coaching Courts

Access to the CCTV system is strictly limited to the Club Captain, Head Coach, Welfare Officer, and System Administrator.

The Club owns and operates the CCTV system. This Policy is subject to annual review by the Westcliff Lawn Tennis Club Committee. The system operates 24 hours a day, recording continuously

This Policy is written in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, the Data (Use and Access) Act 2025 (DUAA 2025), and the ICO CCTV Code of Practice.

Objectives of the CCTV Policy

The objectives of the Club’s use of CCTV are:

- a) To safeguard all persons using the private car park and access-controlled Club grounds
- b) To help protect Club buildings, equipment, and property
- c) To assist the Police in the prevention and detection of crime
- d) To assist in identifying, apprehending, and potentially prosecuting offenders
- e) To support safeguarding where concerns arise involving members, juniors, or visitors

Statement of Intent

The Club treats all CCTV images and recordings as personal data and processes them lawfully, fairly, and transparently.

Cameras are used solely to monitor activity within:

- The Car Park
- Access-controlled areas
- Courts and immediate surrounding areas

This monitoring is undertaken only to identify:

- Criminal activity
- Safety incidents
- Safeguarding concerns (actual, anticipated, or perceived)

Cameras are positioned to ensure they do not overlook private homes, gardens, or areas of private property.

Information obtained through CCTV will never be used for commercial purposes.

Images will only be disclosed:

- To the LTA Safeguarding Team where relevant
- To the Police, upon request
- For car park incidents, to insurers where images assist in identifying vehicles involved

Images will never be released to the media for entertainment or promotional purposes.

While the CCTV system is designed to operate effectively, the Club acknowledges that it cannot guarantee coverage of every incident within the monitored areas.

Appropriate warning signage is displayed at all access points and monitored areas in accordance with ICO guidance.

Control and Liaison

The Club's CCTV service provider is:

Ray Shipman- Associated Security Systems Ltd

The Club Captain and System Administrator are responsible for ensuring the system is functioning correctly. Any faults identified will be reported and rectified in liaison with the service provider.

Monitoring and Retention Procedures

CCTV footage is recording continuously and is automatically overwritten after a period of fourteen (14) days. The Club has assessed this retention period and considers it to be proportionate and necessary to achieve the purposes for which the CCTV system is operated, including security, safeguarding, and the prevention and detection of crime.

CCTV footage will only be retained for a period longer than fourteen (14) days where it is required in connection with the investigation of a reported incident, a safeguarding concern, the prevention or detection of crime, or for the purposes of legal proceedings.

In such circumstances, the relevant footage will be securely extracted from the CCTV system, clearly labelled with the incident date and reference, and stored in a secure location with access restricted to authorised individuals only.

The Data Protection Act and UK GDPR does not prescribe any specific minimum or maximum retention periods that apply to all systems or footage. Therefore, retention will reflect the clubs purposes for recording information, and how long it is needed to achieve this purpose and this must be documented.

Access to and Viewing of CCTV Footage

Access to recorded images will be restricted to the club captain, head coach and welfare officer and will not be made widely available. Supervising the access and maintenance of the CCTV System is the responsibility of the club captain. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis.

All access must be logged.

Footage will not be removed from the Club site or accessed remotely, except in the following circumstances:

- Where footage is formally requested by the Police for the prevention or detection of crime; or
- Where footage is requested by solicitors or other legal representatives for the purposes of legal proceedings, supported by satisfactory documentary evidence or a Court Order

At all other times, CCTV footage will remain securely stored within the Club's CCTV system and viewed on site only.

Disclosure of Images

CCTV images may be viewed by the Police for the prevention and detection of crime.

A register will be maintained recording:

- All memory sticks created
- Any release of footage to the Police or authorised third parties (including the LTA Safeguarding Team)

Viewing or release of footage by external parties must be:

- Formally requested
- Logged in the register

The Club reserves the right to refuse permission for footage to be passed to third parties without appropriate authority.

Footage may be retained at the request of the Police for future evidential use and will be securely stored and indexed.

Requests from external bodies (e.g., solicitors), other than car park incidents, will be referred to the Club Captain and Committee. Footage will normally only be released:

- Where required for legal proceedings; or
- In response to a Court Order

Breaches of the Policy

Any breach of this CCTV Policy, including security breaches, will be investigated initially by the Club Captain and escalated to the ICO where necessary.

Complaints

Complaints regarding the Club's CCTV system should be addressed initially to the Club Captain.

All complaints will be handled in accordance with the ICO CCTV Code of Practice.

Data Subject Rights

Under UK GDPR, the Data Protection Act 2018, and DUAA 2025, individuals have the right to request access to personal data held about them, including CCTV footage.

Requests for Subject Access:

- Can be verbal or in writing
- Be submitted to the Club Captain

Requests will be responded to within one calendar month, subject to verification of identity and applicable legal exemptions.

Policy Review

The club is responsible for monitoring and reviewing this policy. Although this policy is reviewed every three years, changes to legislation, national guidance, codes of practice or advice from the Information Commissioner advice may trigger interim reviews.

The club is aware of the upcoming Data Use and Access Act 2025 and this policy will be reviewed should any changes be brought into force affecting this policy.

Contact Details

Steve Wynn

Club Captain

Westcliff Lawn Tennis Club

626 London Road

Westcliff-on-Sea

SS0 9HW

Email: stevewynn25@yahoo.co.uk

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