

POLICY ON CCTV SYSTEMS & DATA MANAGEMENT

Prepared By

Document Owner(s)	Organization Role
CLTC Executive Committee	Executive Committee

Policy Version Control

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1.0	25/03/2013	PC	Draft Issue
1.1	26/03/2013	PC	Publish Issue
1.2	13/02/2014	Pat Walsh	Add controller assistant

Note:

Closed Circuit Television System (CCTV) is installed in Castleknock Lawn Tennis Club under the remit of the Executive Committee as elected at 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 premises under the remit of the Castleknock Lawn Tennis Club Executive Committee

Purpose of CCTV Systems

CCTVs are installed internally and externally in 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 the Castleknock Lawn Tennis Club Executive Committee 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 Castleknock Lawn Tennis Club and relates directly to the location and use of CCTV, the monitoring, recording and subsequent use of such recorded material.



General Principles

Castleknock Lawn Tennis Club Executive Committee has the responsibility for the protection of its property, equipment and other plant & equipment as well as providing a sense of security to its employees, members, visitors and invitees to its premises. Castleknock Lawn 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 Castleknock Lawn Tennis Club by integrating the best practices governing the surveillance of its premises.

The primary aim of CCTV monitoring Castleknock Lawn 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 authorized by the data controller or his/her assistant following consultation with the Executive Committee.



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

The industry code of practice for video monitoring 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 said establishment is limited to uses that do not violate the reasonable expectation to privacy as defined by law.

The Executive Committee 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 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:

- 2 cameras inside the bar confines
- 1 camera at dance floor in lounge
- 1 camera on Balcony at fire exit
- 2 cameras covering the main entrance lobby to the clubhouse.
- 1 camera covering the lobby to locker rooms a courts 1,2 & 3
- 1 camera in exit lobby locker rooms a courts 1,2 & 3
- 1 camera in Junior room
- 1 camera covering lobby in indoors

- 1 camera covering indoor court 1 (A)
- 1 camera covering indoor court 2 (B)
- 1 camera covering indoor court 3 (C)

- 1 camera covering the indoor courts at balcony level.

Cameras are located in the following external areas:

- 4 Cameras in the clubhouse car park
- 1 Camera at main entrance door to club house
- 1 Camera facing clubhouse electric gates
- 1 external at pedestrian entrance to club

- Signage will be erected in each location in which a camera is located. The signage will include the name and contact detail of the data controller as well as the specific purposes for which the CCTV camera is in place in each location, for example:



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- 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
- for Health & Safety purposes
- to enable the Executive Committee 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 above. 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.

DATA PROTECTION

All personal data recorded and stored by the CCTV system is governed by the Data Protection Acts, 1988 & 2003.

Under the Data Protection Acts, 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 appointed by the Executive Committee and in their absence the Club Chairman will assume the role of Data Controller.



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The personal data recorded and stored by the CCTV system will only be available to the Data Controller and his/her assistant and will be used only for the purposes 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 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 28 days. Thereafter, it will be deleted automatically.

The recorded footage and the monitoring equipment shall be securely stored in the Dry Goods Store. Unauthorised access to that area is not permitted at any time. The area is locked when not occupied and key controlled.

The following procedures shall be followed in the event that An Garda Siochana seeks to view or take a copy of CCTV footage from the Clubs CCTV system.

- 1. The Data Controller shall satisfy himself/herself that there is an investigation underway by telephoning the Garda Station or the requesting Garda and speaking to the Station Sergeant or higher or to a member in the District Office.**
- 2. A request from An Garda Siochana must be made in writing on Garda headed notepaper.**



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

Responsibilities:

The Data Controller will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy sent down by the Executive Committee
- 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
- Ensure that the CCTV monitoring at Castleknock Lawn Tennis Club is consistent with the highest standards and protections.
- 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 the perimeter views from fixed location cameras conform to 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 Executive Committee 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 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 Executive Committee both members and staff petitions 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.
- Advise the Executive Committee to ensure that adequate signage, at appropriate and prominent locations is displayed and included the following in such signage.

‘This Area is subject to Video Monitoring by the Executive Committee’

- 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 monitors are stored in a secure place with access by authorized personnel only.
- Ensure that recorded material is retained for period not longer that 28 days and will then be erased unless



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required as part of a criminal investigation or court proceedings (criminal or civil) or other bona fide use as approved by the Executive Committee

- Ensure that camera control is solely to monitor suspicious behaviour and not individual characteristics.
- Ensure that camera control is not in breach of the intrusion on intimate behaviour by persons in public areas.
- Ensure that mobile video equipment will only be used for criminal investigations and with the approval of the Executive Committee and the local Garda Authorities.