



## Bridport Leisure Centre: Closed Circuit Television (CCTV) Policy

### 1. Introduction

**1.1** Bridport Leisure Centre believes that CCTV and other surveillance systems have a legitimate role to play in helping to maintain a safe and secure environment for all of its staff and visitors. However, Bridport Leisure Centre recognises that this may raise concerns about the effect on individuals and their privacy. This CCTV Policy is intended to address such concerns. Images recorded by surveillance systems are Personal Data which must be processed in accordance with data protection laws. Bridport Leisure Centre is committed to complying with its legal obligations and ensuring that the legal rights of staff and visitors, relating to their Personal Data, are recognised and respected.

**1.2** This policy is intended to assist Bridport Leisure Centre staff in complying with their own legal obligations when working with Personal Data. In certain circumstances, misuse of information generated by CCTV or other surveillance systems could constitute a criminal offence.

### 2. Definitions

For the purposes of this CCTV Policy, the following terms have the following meanings:

**CCTV:** means cameras designed to capture and record images of individuals and property.

**Data:** means information which is stored electronically, or in certain paper-based filing systems. In respect of CCTV, this generally means video images. It may also include static pictures such as printed screen shots.

**Data Controllers:** means those people who, or organisations which, determine the manner in which any Personal Data is processed. They are responsible for establishing practices and policies to ensure compliance with the applicable law. Bridport Leisure Centre is the Data Controller of all Personal Data used in Bridport Leisure Centre's business for Bridport Leisure Centre's own commercial purposes.

**Data Processors:** means any person or organisation that is not a Data User (or other employee of a Data Controller) that Processes Personal Data on Bridport Leisure Centre's behalf and in accordance with Bridport Leisure Centre's instructions (for example, a supplier which handles Personal Data on Bridport Leisure Centre's behalf).

**Data Subjects:** means all living individuals about whom Bridport Leisure Centre holds Personal Data as a result of the operation of its CCTV.

**Data Users:** means those Bridport Leisure Centre employees whose work involves the Processing of Personal Data. This will include those whose duties are to operate CCTV cameras and other surveillance systems to record, monitor, store, retrieve and delete images. Data Users must protect the Personal Data they handle in accordance with this CCTV Policy and Bridport Leisure Centre's Privacy Policy.

**Personal Data:** means data relating to a living individual who can be identified from that data (or other data in Bridport Leisure Centre's possession). This will include video images of identifiable individuals.

**Processing:** is any activity which involves the use of Personal Data, including obtaining, recording or holding data, or carrying out any operation on the Personal Data including organising, amending, retrieving, using, disclosing or destroying it. Processing also includes transferring Personal Data to third parties.

**Surveillance Systems:** means any devices or systems designed to monitor or record images of individuals or information relating to individuals. The term includes CCTV systems as well as any technology that may be introduced in the future such as automatic number plate recognition (ANPR), body worn cameras, unmanned aerial systems and any other systems that capture information of identifiable individuals or information relating to identifiable individuals.

### 3. About This Policy

**3.1** Bridport Leisure Centre currently uses CCTV cameras to view and record individuals on BRIDPORT LEISURE CENTRE premises. This CCTV Policy outlines why Bridport Leisure Centre uses CCTV, how Bridport Leisure Centre will use CCTV and how Bridport Leisure Centre will process Personal Data recorded by CCTV cameras to ensure that Bridport Leisure Centre is compliant with data protection law and best practice. This CCTV Policy also explains how to make a subject access request in respect of Personal Data created by CCTV.

**3.2** Bridport Leisure Centre recognises that Personal Data that Bridport Leisure Centre holds about individuals is subject to data protection legislation. The images of individuals recorded by CCTV cameras in the workplace are Personal Data and therefore subject to the legislation governing data protection, including the General Data Protection Regulation (GDPR).

**3.3** This CCTV Policy covers all employees, trustees, consultants, contractors, self employed persons, volunteers, work experience, casual workers and may also be relevant to visiting members of the public.

**3.4** This policy is non-contractual and does not form part of the terms and conditions of any employment or other contract. Bridport Leisure Centre may amend this policy at any time. The policy will be regularly reviewed by Bridport Leisure Centre to ensure that it meets legal requirements.

### 4. Personnel Responsible

**4.1** The Senior Management Team has overall responsibility for ensuring compliance with relevant legislation and the effective operation of this policy. The Day-to-day management and deciding what information is recorded, how it will be used and to whom it may be disclosed to is the responsibility of the Senior Management Team. Day-to-day operational responsibility for CCTV cameras and the storage of data recorded is the responsibility of the Duty Managers.

**4.2** Responsibility for keeping this policy up to date has been delegated to the HR department, supported by the Centre Manager.

## 5. Reasons for the Use of CCTV

**5.1** Bridport Leisure Centre currently uses CCTV as outlined below. Bridport Leisure Centre believes that such use is necessary for legitimate business purposes, including:

- (a)** to prevent crime and protect buildings and assets from damage, disruption, vandalism and other crime;
- (b)** for the personal safety of staff, visitors and other members of the public and to act as a deterrent against crime;
- (c)** to support law enforcement bodies in the prevention, detection and prosecution of crime;
- (d)** to assist in day-to-day management, including ensuring the health and safety of staff and others; and
- (e)** to assist in the effective resolution of disputes which arise in the course of disciplinary or grievance proceedings.

This list is not exhaustive and other purposes may be or become relevant.

## 6. Monitoring

**6.1** CCTV monitoring is throughout the communal areas of the centre and within the safe room. This data is continuously recorded 24 hours a day.

**6.2** Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring. As far as practically possible, CCTV cameras will not focus on private homes, gardens or other areas of private property.

**6.3** The majority of the surveillance system does not record sound.

**6.4** Images are monitored by authorised personnel. This monitoring is undertaken when required, not as a standard daily function.

**6.5** Staff using surveillance systems will be given appropriate training to ensure they understand and observe the legal requirements related to the processing of relevant data.

## 7. How BRIDPORT LEISURE CENTRE will Operate Any CCTV

**7.1** Where CCTV cameras are placed in the workplace, Bridport Leisure Centre will ensure that signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. Such signs will contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.

**7.2** Bridport Leisure Centre will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include HR staff involved with disciplinary or grievance matters. Recorded images will only be viewed in designated, secure offices.

## 8. Use of Data Gathered by CCTV

**8.1** In order to ensure that the rights of individuals recorded by the CCTV system are protected, BRIDPORT LEISURE CENTRE will ensure that Personal Data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the Personal Data, where it is possible to do so.

**8.2** Given the large amount of Personal Data generated by surveillance systems, BRIDPORT LEISURE CENTRE may store video footage using a cloud computing system. BRIDPORT LEISURE CENTRE will take all reasonable steps to ensure that any cloud service provider maintains the security of our information, in accordance with industry standards.

**8.3** Bridport Leisure Centre may engage Data Processors to process Personal Data on our behalf. Bridport Leisure Centre will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

## 9. Retention and Erasure of Data Gathered by CCTV

**9.1** Personal Data recorded by the CCTV system will be stored digitally using a hard drive storage system. Personal Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Images should not be retained for longer than is necessary. Images will be retained for a period not exceeding 31 days, unless required for evidential purposes or access request consideration. Images from all cameras on the system are recorded 24 hours per day, 365 days per year.

Note: If images are required by the police in the course of their enquiries, the media device containing the images should be handed to a police officer immediately. The officer must sign for the media device (refer to Section 13.3).

**9.2** At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as USB devices will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.

## 10. Use of Additional Surveillance Systems

**10.1** Prior to introducing any new surveillance system, including placing a new CCTV camera in any workplace location, Bridport Leisure Centre will carefully consider if they are appropriate by carrying out a privacy impact assessment (**PIA**).

**10.2** A PIA is intended to assist Bridport Leisure Centre in deciding whether new surveillance cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

**10.3** Any PIA will consider the nature of the problem that BRIDPORT LEISURE CENTRE is seeking to address at that time and whether the surveillance camera is likely to be an effective solution, or whether a better solution exists. In particular, Bridport Leisure Centre will consider the effect a surveillance camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

**10.4** No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in changing rooms or toilets) unless, in very exceptional circumstances, it is judged by Bridport Leisure Centre to be necessary to deal with very serious concerns.

## 11. Covert Monitoring

**11.1** Bridport Leisure Centre will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.

**11.2** In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the board of Trustees. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent workers will always be a primary consideration in reaching any such decision.

**11.3** Only limited numbers of people will be involved in any covert monitoring.

**11.4** Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity.

## 12. Ongoing Review of CCTV Use

**12.1** Bridport Leisure Centre will ensure that the ongoing use of existing CCTV cameras in the workplace is reviewed periodically to ensure that their use remains necessary and appropriate, and that any surveillance system is continuing to address the needs that justified its introduction.

## 13. Requests for Disclosure

**13.1** No images from Bridport Leisure Centre's CCTV cameras will be disclosed to any third party, without express permission being given by the Senior Management Team. Personal Data will not normally be released unless satisfactory evidence that it is required for legal proceedings or under a court order has been produced.

**13.2** In accordance with applicable laws, Bridport Leisure Centre will allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

**13.3** Bridport Leisure Centre will maintain a record of all disclosures of CCTV footage as follows:

Date removed	Time removed	Initials of remover	Reason for removal and viewing; Approving person's name; Requester's name	Outcome of viewing; Time tape was returned to storage; Type of ID provided
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**13.4** No images from CCTV will ever be posted online or disclosed to the media.

#### 14. Subject Access Requests

**14.1** Data Subjects may make a request for disclosure of their Personal Data and this may include CCTV images. A subject access request is subject to the statutory conditions from time to time in place and should be made in writing, in accordance with the Bridport Leisure Centre subject access request procedure.

**14.2** In order for Bridport Leisure Centre to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

**14.3** Bridport Leisure Centre reserves the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where it considers it necessary to do so.

#### 15. Complaints

**15.1** If any member of staff has questions about this policy or any concerns about our use of CCTV, then they should speak to their manager in the first instance or contact the HR Manager.

**15.2** Where this is not appropriate or matters cannot be resolved informally, employees should use our formal grievance procedure.

#### 16. Requests to Prevent Processing

**16.1** Bridport Leisure Centre recognises that, in rare circumstances, individuals may have a legal right to object to processing and in certain circumstances to prevent automated decision making (see Articles 21 and 22 of the General Data Protection Regulation). For further information regarding this, please contact the Bridport Leisure Centre Data Protection Controller.

#### 17. Location of Cameras

D1: Bacit Studio	D11: Squash Court 2	D21: Female Changing (D/S)
D2: Male Changing (D/S)	D12: Group Cycle Corridor	D22: Rear Fire Exit Stairwell
D3: Gym Near	D13: Sports Hall Left	D23: Kinesis
D4: Main Car Park	D14: Swimming Pool Viewing Area	D24: Swimming Pool Stairs
D5: Swimming Pool Corridor	D15: Disabled Car Park Area	D25: Sports Hall Right
D6: Swimming Pool	D16: Entrance Lobby	D26: Gym Corridor
D7: Squash Court 1	D17: Car Park Entrance	D27: Group Cycling
D8: Skill-X	D18: Play Park	D28: Squash Viewing Area
D9: Safe Room	D19: Rear Lobby	D29: Gym Far
D10: Reception Corridor	D20: Lift Area	D30: Top Car Park

## CCTV Competent User Form

### *Section 1: Personal Details*

<b>Full Name:</b>	
<b>Job Title:</b>	
<b>Department:</b>	
<b>Contact Number:</b>	
<b>E-Mail Address:</b>	

### *Section 2: Training and Competency*

<b>Date of CCTV Training:</b>	
<b>Trainers Name:</b>	
<b>Training Organisation (if not internal):</b>	

### *Certification of Competency:*

I hereby certify that the above-named individual has completed the required training for the operation of CCTV equipment and is competent to use the system in accordance with company policies and relevant legislation.

<b>Trainer's Signature:</b>	
<b>Date:</b>	

### *Section 4: User Agreement:*

I, the undersigned, agree to adhere to the following terms and conditions:

1. I will use the CCTV equipment solely for its intended purpose and in compliance with relevant laws and company policies.
2. I will not share my access credentials with unauthorized persons.
3. I will report any malfunction or suspicious activity to the appropriate personnel immediately.
4. I understand that any misuse of the CCTV equipment may result in disciplinary action.

<b>Staff Signature:</b>	
<b>Date:</b>	

### *Section 5: Approval:*

This form must be approved by the individual's Line Manager and one of the Member of the Senior Management Team:

<b>Line Manager Name:</b>	
<b>Line Manager Signature:</b>	
<b>Date:</b>	

<b>Senior Manager Name:</b>	
<b>Senior Manager Signature:</b>	
<b>Date:</b>	

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**Review**

Issue No.	Description of Revision	Date	Review Due Date	Action By
1	None - First Issue	Aug '24	Jul '25	Train designated staff and incorporated the procedure.