



St. Paul's Boxing Academy CIO

CCTV Policy



1. Introduction

St Paul's Boxing Academy CIO is committed to the safety of its volunteers, members and visitors and has invested in the security of its newly refurbished building and facilities. We believe that CCTV plays an important role in helping to maintain a safe and secure environment for everyone.

Images recorded by CCTV are personal data and as such must be processed in accordance with data protection laws. We are committed to complying with our legal obligations and to ensuring that the legal rights of members, coaches, volunteers and visitors are recognised and respected.

2. Definitions

The following terms are used to in this policy

- **CCTV:** means cameras, devices or systems that capture information which identifies individuals or information relating to identifiable individuals.
- **CCTV Data:** means any CCTV data, e.g. video images, static pictures, etc.
- **Data:** means any information which is stored electronically (or in paper-based filing systems).
- **Data Subject:** means any individuals who can be identified directly or indirectly from CCTV data (or other data in our possession). Data subjects include volunteers, members, Trustees, visitors including contractors and other gym users.
- **Data Controller:** is the authority which determines how and for what purpose personal data are processed. When operating CCTV, St Paul's Boxing Academy CIO is the Data Controller and is responsible for ensuring compliance with the Data Protection Laws. This responsibility is delegated to the Management Working Group.
- **Data Processing:** is any activity which involves the use of CCTV data, whether or not by automated means. It includes collecting, obtaining, recording or holding CCTV data, or carrying out any operation or set of operations on the CCTV data including organising, structuring, amending, retrieving, using, disclosing or

erasing or destroying it. Processing also includes transferring CCTV data to third parties.

- **Data Protection Laws:** the Data Protection Act 2018 is the UK's implementation of the General Data Protection Regulation (GDPR).

3. Objectives of the CCTV System

- To protect St Paul's Boxing gym and its assets to ensure they are kept free from intrusion, vandalism, damage or disruption.
- To increase the personal safety of our volunteers, members and visitors and reduce the fear of physical abuse, intimidation and crime.
- To support the police in a bid to deter and detect crime.
- To assist in identifying, apprehending and prosecuting offenders on club premises.
- To assist in the usage and management of the gym on a day to day basis.

4. Statement of Intent

- a) St Paul's will comply with The Data Protection Act 2018 (the UK's implementation of the GDPR), whether it be information, recordings and downloads which relate to the CCTV system.
- b) Cameras will be used to monitor activities within the gym and at both the entrance and exit points to identify criminal activity actually occurring, anticipated, or perceived and also to secure the safety and wellbeing of the users of the gym together with its visitors.
- c) Unless an immediate response to events is required, no cameras will be directed at an individual, their property or a specific group of individuals, without a written authorisation from the Chair of the Management Working Group being obtained.
- d) Materials or knowledge secured as a result of the CCTV system will not be used for any commercial purpose. Downloads will only be released for use in the investigation of a specific crime and with the written authority of the police. Downloads will never be released to the media for purposes of entertainment. Full clarification can be obtained from the Chair of the Management Working Group.
- e) The planning and design of our CCTV system ensures maximum effectiveness and efficiency, but it is not possible to guarantee that the CCTV system will cover or detect every single incident taking place in the areas of coverage.

- f) Warning signs, as required by the Code of Practice of the Information Commissioner's Office (ICO) have been placed in all areas covered by the Club CCTV.

5. Operation of the CCTV System

- a) The system will be administered and managed by the Chair of the Management Working Group who is also a Trustee, in accordance with the principles and objectives expressed in this Policy.
- a) The day-to-day management will be the responsibility of the Head Coach (and any delegated persons) who is the data processor. The Head Coach will make a daily check and confirm the equipment is properly recording and that cameras are functional.
- b) The CCTV system will be operated 24 hours each day, every day of the year.
- c) Access to the CCTV will be **strictly limited** to the individuals approved by the Chair of the Management Working Group on behalf of the Trustee Board.
- b) Unless an immediate response to events is required, no cameras will be directed at an individual or a specific group of individuals.
- c) Any concern expressed by a member of the public should be referred to the Chair of the Management Working Group.
- a) In the event of an emergency a member of the coaching team will contact emergency services.

6. Video Download Procedures

- a) The Data Protection Act 2018 states that recordings may be viewed by authorised officers from Humberside Police for the prevention and detection of crime. Permission to do this will be given by the Chair of the Management Working Group and a written record kept of any data releases.
- b) Downloads will only be released to the Police on the clear understanding that the disc remains the property of St Paul's, and both the disc and information contained on it are to be treated in accordance with this Policy. The Club also retains the right to refuse permission for the Police to pass to any other person the disc or any part of the information contained thereon.
- c) Applications received from outside bodies (e.g. solicitors) to view or release downloads will be referred to the Chair of the Management Working Group. In these circumstances downloads will normally be released where satisfactory

documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a Court Order. The club solicitors will be consulted on all requests.

7. Breaches of the Policy (including breaches of security)

- a) Any breach of this Policy will be initially investigated by the Chair of the Management Working Group for them to take the appropriate disciplinary action.
- b) Any serious breach of the Policy will be immediately investigated by another member of the Trustee Board, and an independent investigation carried out to make recommendations on how to remedy the breach.

8. Assessment of the Scheme and CCTV Usage Policy

Performance monitoring, including random operating checks, may be carried out by an approved representative of the Trustee Board.

9. Complaints

Any complaints about the Club's CCTV system should be addressed to the Chair of the Management Working Group. Complaints will be investigated in accordance with Section 7 of this Policy.

10. Access by the Data Subject

The Data Protection Act 2018 provides Data Subjects with a right to see data held about themselves, including those obtained by CCTV.

Requests for Data Subject Access should be made in writing to the Chair of the Management Working Group.

11. System Maintenance and Monitoring

The system will be maintained in accordance with the Data Protection Act 2018. It will be the responsibility of the Head Coach to report faults and arrange regular system reviews with the maintenance company.

12. Summary of Key Points

- This CCTV Usage Policy will be reviewed on an annual basis.
- The CCTV system is owned and operated by the St Paul's Boxing Academy CIO.
- The CCTV system cannot be accessed by anyone except by prior arrangement with the Chair of the Management Working Group and with good reason.
- Liaison meetings may be held with the Police and other bodies.
- Copies of downloads may only be viewed by authorised staff and the Police and with the express permission of the Chair of the Management Working Group.
- Copies required as evidence will be properly recorded, witnessed and packaged before copies are released to the Police.
- Copies will not be made available to the media for commercial or entertainment reasons.
- Any breaches of this Policy will be investigated by the Chair of the Management Working Group. An independent investigation will be carried out for serious breaches.
- Breaches of the Policy and recommendations will be reported to the Chair of the Management Working Group. The system will be maintained on a regular basis by an approved contractor.

Reviewed: November 2022

Next Review: November 2023