

EAST GLOUCESTERSHIRE CLUB

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CLOSED CIRCUIT TV and VIDEO/PHOTOGRAPHY POLICY

(Version 7/5/21)

1. Introduction

1.1 The purpose of this policy is to regulate the use of closed circuit television (CCTV), video recording and photography on the Club premises and to ensure that all images collected comply with current Data Protection and Safeguarding legislation. This policy applies to East Glos Club and to all members, staff and visitors.

1.2 It explains the following:

- (a) why and how the Club uses CCTV for security surveillance, and fixed video recording as a coaching/promotion aid, together with camera locations and the monitoring arrangements;
- (b) how the Club controls general ad hoc videography and photography on the site;
- (c) the processes used for the recording, the storing, the deletion and the subsequent use of all of the above recorded images.

1.3 This policy follows all relevant guidance and is continually reviewed to ensure that the use of CCTV, videography and photography is always justified and takes into account the effect on individuals and their rights to privacy. The approach the Club takes is to inform individuals that images may be captured and, wherever appropriate, to give them the opportunity to opt out if they object.

2. Closed Circuit TV

2.1 The Club uses CCTV for the specific reason of site surveillance. This has been carefully reviewed and is considered to be appropriate, necessary and legitimate in order to ensure as far as possible a safe and secure environment for members, staff and visitors. Monitoring is conducted in a professional, ethical and legal manner and any diversion of the use of CCTV equipment for other reasons is not allowed.

2.2 The primary aim of CCTV monitoring is to deter trespass, crime and vandalism in order to assist in the protection of the premises and its associated equipment. It supplements the existing intruder and fire alarm systems that are used in the Clubhouse when the premises are closed. It also provides general oversight of the conduct of people on the premises during normal opening hours, thereby helping to ensure a friendly and safe environment for all members, staff and visitors.

2.3 CCTV cameras are only used to capture images of events and activities on the EG site, no neighbouring areas are included. The cameras are located at appropriate and relevant positions. Currently this includes the padel courts; but it is planned to extend in the future to other external courts, entrance & exit areas, immediate surrounds of the Clubhouse and some internal areas including Reception, Corridors, Bar and Lounge. The cameras are positioned to ensure that clear and proper images are obtained to monitor what is happening on site but not specifically to capture an individual's characteristics.

2.4 The cameras are high resolution and record colour images in daylight or floodlit conditions but revert to black and white thermal imaging at night. They are connected by ethernet data cable to a network video recorder in the Club Manager's office where the images are stored and viewed on a monitor screen in the Reception Office. The system stores approximately a month's worth of images on a rolling basis; if any more history is required then a backup copy can be transferred to a separate device such as a USB memory stick. The cameras also have an in-built motion detector facility which, if required in the future, could be enabled and linked to a mobile phone alarm or to our existing intruder/fire alarm system in the Clubhouse.

2.5 All staff, members and visitors to the Club are alerted to the fact that CCTV is being used on the site by signage at the camera locations stating "CCTV in operation etc.", by a statement on the Club website and by notifications in the various application and booking processes.

3. Fixed Video Recording

3.1 The Club is planning to use video equipment in the squash courts for recording training sessions and/or matches to livestream or to replay afterwards. The main purposes is to improve the Club's coaching tools whereby the recording can be subsequently used for video analysis and learning. The system can also be used to livestream competitions/matches for members to watch on TV in the Clubhouse and for marketing of the Club to a more general squash audience via social media.

3.2 A webcam type camera will be used which can be moved between wall mounts in the different squash courts and the images stored and/or livestreamed onto the Club's TV network or social media.

3.3 This recording will only be carried out with permission of players (and the parent if under 18 years old – see section 5 below).

4. General Video/Photography

4.1 Any general video recording or photography undertaken by the Club is always for genuine Club marketing and promotion reasons or to positively reflect an individual's involvement in the Club's sports or activities. Members and visitors may also take videos and photographs but only with the Club's permission. In all cases where an image of an individual is captured, the prior consent of the individual must be obtained (and the parent if under 18 years old – see section 5 below).

4.2 The equipment used should only have sufficient power and capability to capture general and appropriate images of a game or an event, without invading individual privacy. Equipment with lenses of more than 300mm focal length when extended are not permitted other than for use by the Club's approved video/photographers. All images captured by the Club are only used within the Club and in its own publications; or in recognised and accepted external media.

4.3 All Club members and course attendees are informed of the possibility of being videoed or photographed by an appropriate statement in the relevant paperwork/process for membership application, annual membership renewal, and course booking. This applies to all to all membership categories (rackets, hockey, junior, family, social) and to all sports (tennis, squash, padel, hockey).

4.4 Pay & Play visitors are notified of the video/photography policy by a similar appropriate statement in the online court booking process.

4.5 If anyone objects to the above notifications, then they can discuss the details with the Club and every reasonable effort will be made to accommodate them, especially for juniors. The Club will make a note of their objection but also ask them to notify the video/photographer if and when it actually takes place in the future. In some circumstances for adults it may not be possible for the Club to guarantee that an individual can be excluded, in which case they must accept this or they will not be able to participate.

4.6 A general warning that video/photography may take place is also posted on the Club noticeboard and on the Club website, together with a copy of this full policy document. This serves to reinforce the policy to members, course attendees and pay & play visitors as well as to inform general visitors to the Club.

4.7 In addition, for special events such as Open Days or other activities, especially when new visitors will be in attendance, the Club will display a clear prominent notice stating that video/photography will be taking place. It is assumed that all visitors (both adult and juniors) remaining on the site accept the possibility of being videoed or photographed.

4.8 At some events wide-angle and general images may be taken where it may not be proportionate or necessary to obtain consent for every participant.

4.9 The above policy also applies to all Club staff and coaches, the details can be found in the Staff Handbook and in the relevant Employment Contracts or Service Level Agreements.

5. Safeguarding

5.1 In addition to the general points in section 4 above, all video/photography of an adult at risk or an under 18 year old junior (both referred to as a vulnerable person) must also adhere to the strict controls of the Club's Safeguarding Policy. This defines that permission must be obtained from a parent or legal guardian or carer (all referred to as the responsible person).

5.2 Therefore, such videos or photographs of a vulnerable person can be undertaken by the responsible person but not by another vulnerable person. Another adult person is also allowed to take videos or photographs but only with the express permission of the relevant responsible person.

5.3 The Club or its approved agent is authorised to capture appropriate images of all individuals, including vulnerable persons, since permission will have previously been obtained as described in section 4 above. Where objections have been raised for vulnerable persons, as in section 4.5 above, then every effort is made by the Club to exclude them from any videoing or photography. This is achieved by the person who is organising the activity (normally a Club Coaching Manager or coach) in conjunction with the photographer, by referring to the previously noted objections; and assisted by a reminder from the responsible person.

5.4 On some occasions when a junior coaching course or Easter/Summer camp is taking place, the Club may decide to video or photograph extensively for a Club promotion feature. In such cases, the Club will also make every effort to notify all the responsible people to reinforce the Club's policy and to facilitate any objections and exclusions as described in section 5.3 above.

5.5 In addition for vulnerable persons, wherever possible and especially if asked, the photographer will explain to the responsible person where the images will be used. Furthermore, any such images of vulnerable persons published within the Club via noticeboard or subscription email (junior newsletter, E-News) may include their full name. For any images published outside of the Club which can be seen by the general public (including Club social media, local or national news outlets), identification of the vulnerable person is normally limited to first name only; in exceptional circumstances (including where a significant achievement is being recognised or an award is being received) the full name may be used provided that prior permission has been given by the responsible person.

5.6 The Club ensures that all social media postings are properly controlled, monitored, managed and that Club social media is used only for relevant and appropriate purposes by Club staff and members.

5.7 If a video/photograph is taken by mistake or permission is subsequently withdrawn, all reasonable steps would be taken to remove those images from view, but this may be difficult for social media.

5.8 The Club follows the various guidance notes on Safeguarding Policy, Online Safety & Communication Policy and Photography/Filming Best Practice as issued by our sports' national governing bodies (Lawn Tennis Association, England Squash and England Hockey). The Club always uses an authorised professional photographer or staff member; the Club Welfare Officers are responsible for ensuring that the Club Safeguarding Policy is followed at all times.

6. Data Protection

6.1 Any image of an individual, recorded by the CCTV security system, by the squash VR system and any other video/photography, is classed as personal data since it may be possible to use it to identify that individual. Therefore the processes for collecting, storing and accessing the images are governed by the Data Protection Act and are covered by the Club's existing procedures as defined in our Privacy Notice (Members & Visitors) and our Staff Handbook.

6.2 In summary the capture of these images are subject to the six main principles of Data Protection, namely:

- (a) Lawful, fair and transparent;
- (b) For limited purposes;
- (c) Adequate and necessary;
- (d) Accurate and up to date;
- (e) Not kept longer than needed;
- (f) Secure and confidential.

6.3 The Club follows the Information Commissioner's Office guidance in the Surveillance Camera Code of Practice and in the Use of Photography & Video Equipment . The Club Manager is responsible for the operation of the CCTV system, fixed VR equipment and all other video/photography undertaken by the Club. The Data Protection Co-ordinator is responsible for ensuring that the Club complies with all legal requirements.

6.4 Copies of all relevant Club policies and procedures can be found on the Club website and noticeboard.

7. Appendix

7.1 The statement below is included in all paperwork and/or online processes used for all Membership Application, Annual Membership Renewal, Course Booking and Pay & Play Court Booking:

Video/photography may be undertaken during games, events and coaching sessions by people approved by the Club. Such images will be appropriate and only used for marketing purposes, in accordance with the Club's Safeguarding Policy and CCTV & Video/Photography Policy which can be found on the Club website and on the Club noticeboard. If you object to this, please contact Reception.

Please note that CCTV is only used for site surveillance and security.

7.2 The above video/photography notification is always also supplemented by a statement on Data Privacy :

The Club is committed to data privacy and your personal information will be treated properly and securely in accordance with current data protection legislation. Details can be found in the Privacy Notice on the Club website and noticeboard.

7.3 For Hockey members, there is also a very comprehensive statement on Photography in the additional Junior Player Registration Form (which also covers general participation, transportation, medical conditions and fitness), which requires an opt-in signature from the responsible person, as recommended by England Hockey:

PHOTOGRAPHY: In some environments, particularly adult competition it is impossible to control photography by external parties. I am aware that there may be times that photographs and/or footage may be taken during matches and training sessions by approved agents and/or officers of the club. Such images shall only be used for publicity/training purposes in accordance with the England Hockey Safeguarding and Protecting Young People in Hockey Policy and Photography Policy and give consent for my daughter to feature in such photos/ images. I hereby only grant approved agents the right to use the images resulting from the photo/film shoots. This includes any reproductions or adaptations of the images for all general purposes e.g. local newspapers, local magazines, other promotional articles (inc. flyers) and the club website.

7.4 The notice below is displayed prominently at Open Days and other special events:

Video/photography will be taking place at today's event. This is for the purpose of promoting the Club and images may be used on the Club's website, newsletter, social media and other external publications. If you have any concerns regarding this, please contact Reception or the Photographer.

Please note that CCTV is only used for site surveillance and security.