

**LINLITHGOW SPORTS CLUB**  
**CLOSED-CIRCUIT TELEVISION POLICY**

**GENERAL**

**THE AIM OF THE POLICY**

Closed-Circuit Television (CCTV) is operated by the Club for the following purposes:

- To promote the safety and security of Club members, employees, and visitors
- To protect the Club's premises, grounds, and equipment
- To assist in the prevention and detection of crime and anti-social behaviour

The use of CCTV involves the processing of personal data and is carried out in accordance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act 2018, and the Information Commissioner's Office (ICO) CCTV Code of Practice.

CCTV will be used in a manner that is proportionate, necessary, and respectful of individuals' privacy.

**DATA CONTROLLING OFFICER (DCO)**

The Club is the Data Controller for the purposes of UK GDPR.

The Data Controlling Officer (DCO) is responsible for the day-to-day operation and compliance of the CCTV system, including:

- Ensuring compliance with UK GDPR and the Data Protection Act 2018
- Maintaining registration with the Information Commissioner's Office (ICO)
- Handling Subject Access Requests and third-party requests for footage
- Ensuring appropriate security and retention of CCTV images

The DCO shall be appointed by the Board of Management.

**CCTV SITING**

CCTV cameras are installed only in areas where surveillance is considered necessary and proportionate. Cameras are positioned to minimise intrusion into private areas and do not record areas where individuals have a reasonable expectation of privacy.

Cameras are located in the following areas:

- Corridors leading to the lounge and squash areas
- Squash area corridor
- Lounge area (focused on the patio doors)
- Cellar

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- Main external entrance
- Car Park
- Storage sheds
- Back external door

In accordance with ICO guidance, clear and prominent signage is displayed at all entrances to the Club and within the premises to inform individuals that CCTV is in operation, the purpose of monitoring, and who to contact for further information.

**RECORDINGS**

- CCTV images are recorded digitally using a Network Video Recorder (NVR) and are triggered by motion detection, including the detection of people, vehicles, or animals.
- Images are retained for a maximum of 30 days from the date of recording, unless required for the investigation of an incident, legal proceedings, or a lawful request by an authorised body.
- The CCTV system is a local system for internal use only. Remote access is restricted to the DCO and any persons expressly authorised by the DCO.
- Appropriate technical and organisational measures are in place to protect CCTV images from unauthorised access, disclosure, alteration, or loss.

**ACCESS TO IMAGES**

Access to CCTV images is restricted and controlled. Images may be disclosed only in the following circumstances:

- To the police or other law enforcement agencies where disclosure is necessary for the prevention or detection of crime, or the prevention of terrorism or disorder
- To prosecution authorities
- To emergency services where required for the investigation of an accident or serious incident
- In response to a Subject Access Request (SAR) made by an individual who believes they have been recorded by the CCTV system

**SUBJECT ACCESS REQUEST**

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Subject Access Requests must be made in writing to the DCO and will be handled in accordance with UK GDPR requirements. Requests will normally be responded to within one calendar month.

Where access is granted, the DCO will arrange appropriate access to the relevant images, taking care to protect the rights and freedoms of other individuals captured in the footage.

Under UK GDPR and the Data Protection Act 2018, access to CCTV images may be refused or restricted where disclosure would prejudice the prevention or detection of crime, or the apprehension or prosecution of offenders. Any refusal will be fully documented, and the requester will be informed of the decision and the reasons for it.

**COMPLAINTS AND ICO CONTACT**

Any individual who has concerns about the operation of the Club's CCTV system or the handling of CCTV images is encouraged to raise the matter in the first instance with the Data Controlling Officer (DCO).

If a concern cannot be resolved internally, individuals have the right to lodge a complaint with the Information Commissioner's Office (ICO), the UK's independent authority for data protection.

**Information Commissioner's Office (ICO)**

Wycliffe House  
Water Lane  
Wilmslow  
Cheshire  
SK9 5AF

Telephone: 0303 123 1113

Website: [www.ico.org.uk](http://www.ico.org.uk)