

Viva Gymnastics Club CCTV Policy

Policy owner: Charlotte Vella

CCTV lead / data protection contact: Charlotte Vella

Contact email: Admin@viva-gymnastics.club

Club premises: Unit 8D, Skill Centre, Limberline Spur, Portsmouth, PO3 5LF

Applies to: Staff, coaches, volunteers, members, parents/carers, visitors, contractors and any person entering areas covered by CCTV

Review date: Annually, or sooner if the CCTV system, premises, risks or data protection law changes

1. Purpose of this Policy

Viva Gymnastics Club uses closed-circuit television ("CCTV") as a security measure to help protect children, young people, adults, staff, volunteers, visitors, premises and property. This policy explains how CCTV is used in a lawful, fair, transparent, appropriate and proportionate way, in line with the UK General Data Protection Regulation ("UK GDPR"), the Data Protection Act 2018 and relevant guidance from the Information Commissioner's Office.

2. Scope

This policy applies to all CCTV systems operated by or on behalf of Viva Gymnastics Club at Unit 8D, Skill Centre, Limberline Spur, Portsmouth, PO3 5LF, and any associated areas under the club's control. The club currently operates four cameras inside the gym area, covering reception, the shutters and both back corners of the gym. CCTV must not be used in private areas where individuals have a reasonable expectation of privacy, including toilets, changing rooms, treatment rooms or similar spaces.

3. Lawful Basis and Data Protection Principles

CCTV images that identify living individuals are personal data. Viva Gymnastics Club will process CCTV footage only where there is a valid lawful basis. The usual lawful basis will be the club's legitimate interests in maintaining security, preventing and detecting crime, protecting property, supporting safeguarding, and promoting the safety of those using the premises. These interests will be balanced against the rights and freedoms of individuals, particularly children and young people.

Viva Gymnastics Club will comply with the UK GDPR principles by ensuring that CCTV use is lawful, fair and transparent; collected for specified and legitimate purposes; limited to what is necessary; accurate where relevant; kept for no longer than necessary; protected by appropriate security; and managed with accountability.

4. Appropriate and Proportionate Use

CCTV will be used only where it is necessary to meet clearly defined security and safety purposes, and where less intrusive measures would not reasonably achieve the same aim. Cameras are positioned to minimise intrusion and avoid unnecessary recording of neighbouring property, public spaces or areas not relevant to the club's security needs.

CCTV will not be used for routine monitoring of staff, coaches, volunteers, members or parents/carers. Footage must not be used for any purpose incompatible with the original security and safety purposes unless required or permitted by law.

5. Safeguarding and Children

Because Viva Gymnastics Club works with children and young people, particular care will be taken to protect their privacy and dignity. CCTV is not a substitute for safeguarding policies, safer recruitment, supervision, coaching standards or incident reporting. Any use of CCTV in connection with safeguarding concerns will be handled confidentially and only by authorised persons with a genuine need to access the footage.

6. Transparency and Signage

Clear and visible signs will be displayed at entrances and within areas covered by CCTV, including the gym area where cameras cover reception, the shutters and both back corners. Signs will state that CCTV is in operation, identify Viva Gymnastics Club as the organisation responsible for the system, explain the main purpose of recording, and provide contact details for enquiries: Charlotte Vella, CCTV lead / data protection contact, via Admin@viva-gymnastics.club. The club's privacy information will also explain how CCTV footage is used, retained, protected and shared.

7. Audio Recording

Audio recording is generally more intrusive than video recording and will not be used unless there is a specific, justified, documented and lawful reason. If audio recording is ever considered, the club will complete a data protection impact assessment and update signage and privacy information before use.

8. Access to Live and Recorded Footage

Access to CCTV footage will be restricted to authorised individuals approved by the Charlotte Vella & Lucy Fox. Access will be granted only where necessary for the purposes set out in this policy, such as investigating security incidents, safeguarding concerns, accidents, theft, vandalism or requests from law enforcement agencies.

Authorised users must keep footage confidential, must not copy or share footage without approval, and must record when footage is viewed, exported, disclosed or

deleted. Access permissions will be reviewed regularly and removed when no longer required.

9. Retention and Deletion

CCTV footage will be retained only for as long as necessary for the purposes for which it was collected. The standard retention period will be no longer than 30 days unless footage is required for an investigation, safeguarding matter, insurance claim, legal claim, disciplinary process, law enforcement request or other legitimate reason.

Where footage is retained beyond the standard period, the reason must be documented and the footage must be securely deleted when no longer required. Routine deletion should be automated where possible.

10. Security of CCTV Data

Viva Gymnastics Club will protect CCTV systems and footage using appropriate technical and organisational measures. These may include password protection, restricted user accounts, secure storage, access logs, encryption where available, locked equipment, controlled export of footage and regular checks that cameras and recording equipment are functioning correctly.

11. Disclosure of Footage

CCTV footage will not be disclosed to third parties unless there is a lawful reason to do so. Disclosure may be made to the police, local authority safeguarding teams, insurers, legal advisers or other relevant bodies where necessary and lawful. Any disclosure must be proportionate, limited to the relevant footage, documented, and approved by an authorised person.

Footage must not be posted on social media, shared informally, shown to unauthorised individuals or used for entertainment, training or promotional purposes without a clear lawful basis and appropriate safeguards.

12. Individual Rights and Subject Access Requests

Individuals have rights under data protection law, including the right to request access to CCTV footage in which they are identifiable. Requests should be made to the club in writing where possible and will usually be responded to within one calendar month.

Before releasing footage, Viva Gymnastics Club will take steps to confirm the requester's identity, locate the relevant footage, consider the rights of other individuals captured, and redact or withhold footage where required or permitted by law. The club may refuse or limit a request where an exemption applies, for example where disclosure would prejudice crime prevention, safeguarding, legal proceedings or the rights of others.

13. Data Protection Impact Assessment

Before installing new CCTV cameras, changing camera locations, introducing new technology, enabling audio, extending coverage or using footage for a new purpose, Viva Gymnastics Club will assess whether a Data Protection Impact Assessment is required. Where CCTV may create a high risk to individuals' rights and freedoms, particularly children, a Data Protection Impact Assessment will be completed before the change is made.

14. Responsibilities

Charlotte Vella And club trustees are responsible for ensuring that CCTV is operated lawfully and in accordance with this policy. Charlotte Vella, as the appointed CCTV lead / data protection contact, is responsible for day-to-day administration, responding to requests, maintaining records, arranging reviews and ensuring authorised users understand their responsibilities.

All staff, coaches and volunteers must report any concerns about CCTV misuse, unauthorised access, loss of footage, suspected data breach or safeguarding issue promptly to the appointed contact or Club Management Committee.

15. Complaints and Concerns

Anyone with concerns about the club's use of CCTV should contact Viva Gymnastics Club in the first instance by contacting Charlotte Vella, CCTV lead / data protection contact, via Admin@viva-gymnastics.club. The club will investigate concerns promptly and fairly. Individuals also have the right to complain to the Information Commissioner's Office if they are unhappy with how their personal data has been handled.

16. Review and Compliance Monitoring

This policy and the CCTV system will be reviewed at least annually to confirm that CCTV remains necessary, proportionate and effective. The review will consider camera locations, signage, retention periods, access controls, incidents, requests, complaints, system security and whether less intrusive alternatives could meet the same objectives.

17. Practical CCTV Checklist

- Confirm and document the specific security and safety reasons for CCTV.
- Position cameras only where needed and avoid private or unnecessary areas.
- Display clear CCTV signs before individuals enter monitored areas.
- Restrict access to footage to authorised people only.
- Keep footage for no longer than necessary, normally no more than 30 days.
- Record all viewing, copying, disclosure and extended retention of footage.
- Handle subject access requests within one calendar month unless an extension is permitted.
- Review the system annually and whenever circumstances change.