

LIFE LEISURE CLOSED CIRCUIT TELEVISION (CCTV) POLICY



INTRODUCTION

The purpose of this Policy is to regulate the management, operation and use of the closed circuit television (CCTV) system at Life Leisure facilities.

The system comprises a number of cameras located around certain Life Leisure sites. All cameras are monitored within a particular facility by the General Manager.

This Policy follows Data Protection Act Guidelines. The Policy will be subject to review annually.

The CCTV system is owned by Life Leisure (company number 4304674). Any use of CCTV systems at a facility will not intrude unreasonably on the privacy of public or staff.

Monitoring is done expressly for the protection of public, and consideration of the placement of cameras will be very sensitive to avoid areas that would reasonably be considered to be inappropriate.

OBJECTIVES OF THE CCTV SCHEME

- (a) To ensure personal safety of public and staff
- (b) To protect the Council buildings and their assets
- (c) To support the Police
- (d) To assist in identifying, apprehending and prosecuting offenders
- (e) To protect members of the public and private property
- (f) To assist in managing the facility

STATEMENT OF INTENT

The CCTV scheme is registered with the Information Commissioner under the terms of the Data Protection Act 1998 and will seek to comply with the requirements both of the Data Protection Act and the Commissioner's Code of Practice.

Life Leisure will treat the system and all information, documents and recordings obtained and used as data which is protected by the Act.

Cameras will be used to monitor areas and activities within the facility and its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of public and staff, together with its visitors. CCTV cameras are fixed in terms of their positioning.

Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Recordings will only be released for use in the investigation of a specific crime and with the written authority of the Police. Recordings will never be released for the purposes of entertainment.

The planning and design has endeavoured to ensure that the scheme will provide maximum effectiveness/usefulness while ensuring reasonable privacy, but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.

Warning signs, as required by the Code of Practice of the Information Commissioner have been placed in areas covered by the CCTV system.

OPERATION OF THE CCTV SYSTEM

The scheme will be administered and managed by the Technical Manager, in accordance with the principles and objectives expressed in the Code of Practice.

The day-to-day management will be the responsibility of both the Technical Manager and the Centre Manager.

The CCTV system will be operated throughout all opening hours of the building.

The Centre Manager will check and confirm the efficiency of the system on a weekly basis and in particular that the equipment is properly recording and that cameras are functional.

Any maintenance issues will be reported to the Technical Manager immediately.

Access to the CCTV facilities will be strictly limited to the Centre Manager.

MONITORING PROCEDURES

Camera surveillance will be maintained at all times. Pictures will be continuously recorded, and are accessible only by the Centre Manager.

RECORDING PROCEDURES

In order to maintain and preserve the integrity of the recordings used to record events from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

- I. Each disc must be identified by a unique mark.
- II. Before using, each disc must be cleaned of any previous recording.
- III. The controller shall register the date and time of disc insert, including disc reference.
- IV. A disc required for evidential purposes must be sealed, witnessed, signed by the controller, dated and stored in a separate, secure, evidence disc store. If a disc is not copied for the Police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the controller, dated and returned to the evidence disc store.
- V. If the disc is archived the reference must be noted.

Discs may be viewed by the Police for the prevention and detection of crime. A record will be maintained of the release of discs to the Police or other authorised applicants. A register will be available for this purpose.

Viewing of discs by the Police must be recorded in writing and in the log book. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

Should a disc be required as evidence, a copy may be released to the Police under the procedures described in paragraph 8.1 (iv) of this Code/Policy.

Discs will only be released to the Police on the clear understanding that the disc remains the property of Life Leisure, and both the disc and information contained on it are to be treated in accordance with this Code/Policy.

Life Leisure also retains the right to refuse permission for the Police to pass the disc or any part of the information contained thereon to any other person/third party. On occasions

when a Court of Law requires the release of an original disc this will be produced from the secure evidence disc store, complete in its sealed bag.

The Police may require Life Leisure to retain the stored discs for possible use as evidence in the future. Such discs will be properly indexed and properly and securely stored until they are needed by the Police.

Applications received from outside bodies (e.g. solicitors) to view or release discs will be referred to the Technical Manager. In these circumstances discs 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. A fee can be charged in such circumstances.

BREACHES OF THE CODE (including breaches of security)

Any breach of the Code of Practice by Life Leisure staff will be initially investigated by the Operations Manager, in order to take the appropriate disciplinary action. Any serious breach of the Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy such a breach.

ASSESSMENT OF THE SCHEME & CODE OF PRACTICE

This CCTV policy will be reviewed annually.

ACCESS BY THE DATA SUBJECT

The Data Protection Act provides Data Subjects (individuals to whom "personal data" relates) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to the Operations Manager.

COMPLAINTS

Any complaints regarding Life Leisure's CCTV system should be addressed to the Technical Manager.

PUBLIC INFORMATION

Copies of this Code of Practice will be available to the public from the Life Leisure Centre Manager.