



**LISBURN
BMXCLUB**

CCTV Policy

Version 1 02/04/25

1. Background

1.1 Lisburn BMX Club uses closed circuit television (CCTV) (video, audio & images) for the prevention, identification and reduction of crime and to monitor the Club buildings and outside spaces in order to provide a safe and secure environment for members, visitors and contractors and to prevent the loss or damage to club property.

1.2 CCTV surveillance at the Club is intended for the purposes of:

- protecting the Club buildings and Club assets, both before, during and after Club opening hours
- ensuring the health and safety of members, parents, visitors and person on site
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- supporting the Police in a bid to deter and detect crime
- assisting in identifying, apprehending and prosecuting offenders
- assisting the Club's Safeguarding Officers in investigations into safeguarding complaints against any member, visitor or persons on site
- ensuring that the Club policies are respected so that the Club can be properly managed

- the club may at times live stream races from selected CCTV cameras

1.3 The system comprises of multiple fixed and PTZ cameras with current locations as listed in Appendix A

1.4 The CCTV system is owned and operated by the Club and its deployment is determined by the Club's committee or trustees. It is serviced as required to ensure its successful operation by Total Asset Security, who installed the system

1.5 The CCTV is monitored centrally from the Club container by designated appointees and is also on the trustees & safeguarding officer devices, other authorised members may be designated as backup in case access is needed out of office hours or during holidays.

In case of emergency or to provide extra holiday cover, the Chairman, any trustee or the Secretary may approve an additional Committee member to install the app on a temporary basis.

1.6 The Club's CCTV Scheme is registered with the Information Commissioner under the terms of the Data Protection Act. This policy outlines the Club's use of CCTV and how it complies with the Act.

1.7 All authorised persons with access to images are aware of the procedures that need to be followed when accessing the recorded images. All authorised persons are aware of the restrictions in relation to access to, and disclosure of, recorded images.

1.8 The Club complies with Information Commissioner's Office (ICO) CCTV Code of Practice to ensure it is used responsibly and safeguards both trust and confidence in its continued use.

1.9 The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy e.g. CCTV will not be used for monitoring performance.

1.10 CCTV monitoring of public areas for security purposes will be conducted in a manner consistent with all existing policies adopted by the Club, including all Safeguarding policies for each section of the Club and guidance as well as relevant legislation.

2. Justification for Use of CCTV

2.1 The use of CCTV to monitor the Club buildings, car park and outside space for security purposes has been deemed to be justified by Club committee and trustees. The system is intended to capture images, video & potentially audio of intruders or of individuals (which may include members) damaging property or removing goods without authorisation, of anti- social behaviour or any act which may cause a breach of the laws which apply to the club.

2.2 The system may also be used to provide evidence where a potential Safeguarding issue has been identified.

2.3 The system may also be used to provide evidence where a potential verbal abuse or threatening behaviour has taken place.

2.4 CCTV systems will not be used to monitor normal member / visitor activity in any part of the Club.

3. Data Protection Impact Assessments

3.1 Where any additional CCTV cameras are to be installed, the Club will carry out a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation.

4. Location of Cameras

4.1 Cameras will be sited so they only capture images, video & audio relevant to the purposes for which they are installed and care will be taken to ensure that reasonable privacy expectations are not violated.

4.2 The Club will ensure that the location of equipment is carefully considered to ensure that images captured comply with the Data Protection Act. The Club will make every effort to position cameras so that their coverage is restricted to the Club premises, which can include both indoor and outdoor areas.

4.3 Use of CCTV to monitor areas where individuals would have a reasonable expectation of privacy would be difficult to justify (changing room, showering area or toilets). Lisburn BMX Club has

endeavoured to select locations for the installation of CCTV cameras which are least intrusive to protect the privacy of individuals.

4.4 Cameras placed so as to record external areas are positioned in such a way as to prevent as far as possible any recording of passers-by or of adjoining property.

4.5 CCTV Video Monitoring and Recording of Public Areas may include the following:

- Protection of Club buildings and property: The facilities perimeter, entrances and exits, Pump Track, BMX Track Storage containers, car park, common areas, road way on site and electrical box.
- Monitoring of Access Control Systems: Monitor and record restricted access areas at entrances to buildings and other areas
- Criminal Investigations (carried out by police): Robbery, burglary, vandalism, assault and theft surveillance
- violations of club policies including verbal abuse or threatening behaviour towards other members, volunteers or visitors.
- Safeguarding : Reports of any safeguarding issue involving a member or visitor to the Club

4.6 A list of the cameras including what their range of view is attached as Appendix A. This list will be updated if cameras are moved or more cameras are deployed, agreed by committee and subject to relevant risk assessment

5. Covert Surveillance

5.1 Lisburn BMX Club may at times engage in covert surveillance for the above purposes as agreed by the committee.

6. Notification

6.1 A copy of this CCTV Policy will be provided on request to members, parents and visitors to the Club and will be made available on the Club website.

6.2 Adequate signage will also be prominently displayed at various points around the Lisburn BMX Club property to indicate that CCTV is in use. Signage at the entrance to the facility will include the name and contact details of the data controller

7. Storage and Retention

7.1 The images, video & audio captured by the CCTV system will be retained as defined on the system, except where the image identifies an issue and is retained specifically in the context of an investigation/prosecution of that issue where they will be shared with lawyers or police.

7.2 The images, video, audio recordings will be stored in a secure environment with a log of access including Authorisations where the access is deemed to need it e.g. relates to safeguarding, or a member of the club may be involved.

7.3 Access will be restricted to authorised personnel. Supervising the access and maintenance of the CCTV System is the responsibility of the Chairman of committee. The Chairman may delegate the administration of the CCTV System to another committee member or trustee.

7.4 In certain circumstances, and if deemed fit the recordings may also be viewed by other individuals in order to achieve the objectives set out above. When CCTV recordings are being viewed, access will be limited to authorised individuals on a need-to-know basis. If a member or visitor is involved they will be invited to view the recording in the presence of 2 members of committee which may include the Safeguarding officer.

8. Access

8.1 Recorded footage and the monitoring equipment will be securely stored in the Club container. Unauthorised access to that area will not be permitted at any time. A log of access to footage will be maintained.

8.2 Access to the CCTV system and stored images, video & audio will be restricted to authorised personnel only.

8.3 When accessing images, video & audio in a case which requires authorisation two authorised members or committee must be present. A written record of access will be made. Records of access will be kept. If in an emergency a single person needs to access footage (e.g. a police request out of office hours), a second person must also view it as soon as possible and the nature of the emergency will be logged on the access log. These logs will be kept for up to 3 years.

8.4 A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge. These logs will be kept for up to 3 years. Under ICO rules, requests deemed frivolous will be refused.

8.5 Data will be provided to those requests authorised in a permanent format where possible. If this is not possible the data subject will be offered the opportunity to view the footage. If other members are involved and viewing would breach their privacy, a description of the footage will be provided.

8.6 In relevant circumstances, CCTV footage may be accessed:

- By the police where Lisburn BMX Club (or its agents) are required by law to make a report regarding the commission of a suspected crime; or
- Following a request by the police when a crime or suspected crime has taken place and/or when it is suspected that illegal/anti-social behaviour is taking place on Lisburn BMX Club property, or
- To the HSE and or
- To assist the Chairman in establishing facts in cases of unacceptable member or visitor behaviour, in which case, the parents/guardians will be informed if a junior is the subject of the case; or
- To assist the Chairman in establishing facts in cases of unacceptable behaviour by an member or visitor or
- To data subjects (or their legal representatives), pursuant to a Subject Access Request or
- To individuals (or their legal representatives) subject to a court order.
- To the Club insurance company (Zurich Insurance UK) where the insurance company requires same in order to pursue a claim for damage done to the insured property.

9. Subject Access Requests (SAR)

9.1 Individuals have the right to request access to CCTV footage relating to themselves under the Data Protection Act.

9.2 Individuals submitting requests for access will be asked to provide sufficient information to enable the footage relating to them to be identified. For example, date, time and location.

9.3 The Club will respond to requests within 30 calendar days of receiving the request in line with the Club's right of access policy. Complex requests may be extended to 3 months in line with ICO guidance, a fee of £10.00 may apply.

9.4 The Club reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals, perceive it to be a safeguarding issue or jeopardise an on-going investigation.

9.5 A record of the date of the disclosure along with details of whom the information has been provided to (the name of the person and the organisation they represent) and why they required it will be made.

9.6 In giving a person a copy of their data, the Club may provide a still/series of still pictures, a tape or a disk with relevant images. However, other images of other individuals will be obscured before the data is released. Where footage contains images relating to 3rd parties, the Club will take appropriate steps to mask and protect the identities of those individuals if possible. If not, they will seek permission to release the footage from the individuals concerned. If that permission is not granted, the footage will be described but not released.

To request a SAR email Lisburn BMX Club compliance, E: compliance@lisburnbmclub.com.

10. Complaints

10.1 Complaints and enquiries about the operation of CCTV within the Club should be directed to Lisburn BMX Club compliance, E: compliance@lisburnbmclub.com.

11. Training (relates to trustees or committee members authorised (authorised persons) to access the system

11.1 authorised persons will be trained to comply with this policy, authorised persons will understand that all information relating to the CCTV images must be handled securely.

11.2 authorised persons will receive appropriate training to enable them to identify and handle different requests according to regulations.

12. Responsibilities

12.1 The Chairman of the committee will:

- Ensure that the use of CCTV systems is implemented in accordance with the policy set down by Lisburn BMX Club
- Oversee and co-ordinate the use of CCTV monitoring for safety and security purposes within by Lisburn BMX Club
- Ensure that all existing CCTV monitoring systems are evaluated for compliance with this policy
- Ensure that the CCTV monitoring at by Lisburn BMX Club is consistent with the highest standards and protections
- Review camera locations and be responsible for approving the release of any information or recorded CCTV materials stored in compliance with this policy
- Ensure a record of access (e.g. an access log) to or the release of tapes or any material recorded or stored in the system is maintained

- Ensure that the perimeter of view from fixed location cameras conforms to this policy both internally and externally
- Ensure that all areas being monitored are not in breach of an enhanced expectation of the privacy of individuals within the Club and be mindful that no such infringement is likely to take place
- Ensure that external cameras are non-intrusive in terms of their positions and views of neighbouring residential housing and comply with the principle of “Reasonable Expectation of Privacy”
- Ensure that monitoring footage are stored in a secure place with access by authorised personnel only
- Ensure that images recorded on tapes/DVDs/digital recordings are stored for a period not longer than 30 days and are then erased unless required as part of a criminal investigation or court proceedings (criminal or civil).
- Ensure that when a zoom facility on a camera is being used, there is a second person present with the operator of the camera to guarantee that there is no unwarranted invasion of privacy
- Ensure that camera control is not infringing an individual’s reasonable expectation of privacy in public areas

Appendix A

Fixed CCTV Cameras at Lisburn BMX Club

1. Bike Container over looking pump track

2. Main black container looking over pens
3. Main black container looking over start hill
4. Start hill- over looking 1st & final straights
5. Start hill- over looking 2nd Berm. 2nd straight & 3rd straight.
- 6 Grey container – overlooking the pump track and main gate
- 7 Grey container – overlooking the 4th berm and common area
- 8 Grey container – overlooking the lane way & railway bank

PTZ CCTV Cameras at Lisburn BMX Club

- 1: Grey container – 360 degree , Overlooking road way in, main gate, pump track & rear car park