

# CCTV Policy Document

**West Linton Golf Club**, Medwyn Road, West Linton, EH46 7HN

**Version:** 1.0 | **Date:** 22 May 2026 | **Approved By:** West Linton Club Council | **Regulation:** UK GDPR / Data Protection Act 2018

## 1. Introduction & Purpose

This policy governs the installation, operation, management and use of Closed Circuit Television (CCTV) systems across all premises and land owned or managed by West Linton Golf Club, including the clubhouse, car parks, entrance and exit areas, practice facilities, maintenance areas, buggy storage, and perimeter boundaries.

We operate CCTV lawfully, transparently and proportionately, fully complying with data protection and privacy laws. Our objectives are:

- Protect the safety and security of members, guests, staff, contractors and visitors
- Prevent, deter and detect crime, vandalism, theft, damage or unauthorised activity
- Secure club assets, property, equipment and vehicles
- Assist police investigations and provide evidence when required
- Support health and safety compliance and incident management
- Comply with insurance and regulatory requirements

**Lawful Basis:** We process personal data captured via CCTV under **Legitimate Interests (Article 6(1)(f) UK GDPR)**, balanced against individual privacy rights, following a formal Data Protection Impact Assessment (DPIA).

## 2. Scope & Coverage

- **Authorised Locations:** Cameras are positioned only in public and common areas: main entrances/exits, reception, corridors, car parks, pro shop, patio/terrace, buggy storage, maintenance yard, and key perimeter points.
- **Excluded Areas:** No cameras are installed in changing rooms, toilets, showers, private offices, or any area where individuals have a reasonable expectation of privacy.
- **Signage:** Clear, visible notices are displayed at all entry points and camera zones, stating “*THIS AREA IS COVERED BY CCTV FOR SECURITY PURPOSES*”, including contact details for enquiries.
- **Audio:** Audio recording is **not enabled** at any location.

- **Covert Recording:** No hidden cameras are used; all cameras are clearly visible. Exceptional use requires written approval, risk assessment and legal review.

### 3. Roles & Responsibilities

- **Data Controller:** West Linton Golf Club, Medwyn Road, West Linton, EH46 7HN
- **CCTV Manager:** Club Secretary holds overall responsibility for compliance, security, access control and policy implementation
- **Authorised Users:** Only named senior staff (Club Secretary, Club Manager, Head Greenkeeper, Council Members, designated security personnel) may view, access or retrieve footage, strictly limited to necessary duties
- **Service Provider:** Approved external supplier only – no third-party access without written agreement, confidentiality obligations and data protection compliance clauses

### 4. Operation, Recording & Retention

- **System Operation:** Cameras operate 24 hours a day, 7 days a week. Live viewing is only activated when responding to an incident or alarm activation.
- **Image Quality:** Set to capture clear, identifiable images without zooming into private spaces or extending coverage beyond club boundaries.
- **Retention Period:** Footage is stored for a maximum of **30 calendar days**, then automatically and securely deleted or overwritten – never kept longer than necessary.
- **Storage:** Held on secure, password-protected, encrypted equipment located in a locked, restricted-access room; no unauthorised external or cloud storage without formal approval.
- **Audit Log:** All access, viewings, downloads or disclosures are recorded in a register: date, time, person involved, purpose, and action taken.

### 5. Access, Disclosure & Use of Footage

- **Internal Access:** Only authorised staff, and only for purposes defined in this policy. CCTV is never used to monitor staff performance or for disciplinary action unless evidence of misconduct, safety breach or crime is identified.
- **External Disclosure:** Footage is only shared when legally permitted or required:
  - Police or law enforcement agencies – only upon formal written request
  - Insurance companies – to support claims, with proof of valid requirement
  - Health & Safety Executive or regulators – upon official request

- Individuals making a Subject Access Request (SAR) – see Section 6
- **No disclosure** to media, members, the public or other third parties without legal authority, court order or explicit consent.
- **Redaction:** When releasing footage, images of third parties are blurred or obscured to protect their privacy rights.

## 6. Subject Access Rights

Individuals may request a copy of footage containing their own image:

- Submit a request in writing or by email to the Secretary, providing proof of identity and details of date, time and location concerned
- We respond within **one calendar month** (extendable by two months for complex cases)
- Data is provided in a commonly accessible format, free of charge; a reasonable fee may apply only for excessive or repeated requests
- Where footage includes others, images are redacted; requests may be refused if they would compromise others' rights or ongoing investigations
- Rights to correct inaccurate data, restrict processing or object are respected; complaints may be referred to the Information Commissioner's Office (ICO).

## 7. Data Security & Maintenance

- System protected by strong passwords, encryption, physical security measures and regular software updates
- Operational checks performed weekly; full maintenance and compliance review annually
- Supplier contracts include data protection clauses, confidentiality and secure handling obligations
- No copying, editing or sharing of footage unless formally authorised
- Breach procedure: any loss, unauthorised access or disclosure reported immediately to the CCTV Manager and to the ICO where legally required

## 8. Compliance & Review

- This policy is reviewed annually, or earlier if system changes, legal updates or risk assessment findings require amendment
- Full Data Protection Impact Assessment (DPIA) completed prior to installation or major changes

- Relevant staff receive training on CCTV use, privacy obligations and data protection requirements
- Policy is published on the club website and available to all members, staff and visitors on request

## 9. Contact Details

For all CCTV, privacy or data enquiries:

### **Club Secretary**

West Linton Golf Club

Medwyn Road

West Linton

EH46 7HN

Email: [secretarywlgc@outlook.com](mailto:secretarywlgc@outlook.com)

Telephone: 01968 660970

**Information Commissioner's Office:** <https://ico.org.uk> | Helpline: 0303 123 1113