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Swim Central, Fulwood Central, Preston, PR2 9BQ

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1. Introduction

At Swim Central we believe that CCTV plays a legitimate role in helping to maintain a safe and secure environment for all our staff, customers, potential customers, employees of its partners and suppliers and contractors. Images recorded by CCTV are Personal Data and as such must be processed in accordance with Data Protection Laws. We are committed to complying with our legal obligations in order to appropriately handle and protect Personal Data and ensure that the legal rights of staff, customers, and potential customers, employees of its partners and suppliers and contractors relating to their Personal Data, are recognised and respected.

This policy is intended to explain the uses of CCTV, the departments responsible for CCTV use, which individuals have access to CCTV images and how individuals can raise any queries or concerns they may have.

2. CCTV System Overview

The CCTV system is owned by F1T Limited and managed by Swim Central, Unit 3, Fulwood, PR2 9BQ.

Under current Data Protection Legislation F1T is the 'Data Controller' for the images produced by the CCTV system. The Centre Manager, is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy. The Centre Manager is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice. Cameras are sited to ensure that they cover Swim Central's premises as far as is possible. Cameras are installed throughout the centre.

3. Purposes of the CCTV system

The principal purposes of Swim Central's CCTV system are as follows: - for the prevention, reduction, detection and investigation of crime and other incidents; - to ensure the safety of staff and visitors and to assist in the investigation of suspected breaches of regulations by staff or visitors.

The CCTV system will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

Swim Central seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

4. Monitoring and recording

Cameras are monitored in the Security Room, which is a secure cupboard in the staff area that is always locked. Images are recorded centrally on servers and are viewable in the security room area by all management staff. Additional staff may be authorised by the Centre Manager to monitor cameras sited within their own areas of responsibility on a view only basis. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate. All images recorded by the CCTV System remain the property and copyright of Swim Central.

The cameras are situated in the following areas:

- Front of house/reception
- Pool entrance
- Pool exit
- Pool view 1
- Pool view 2
- Pool view 3
- Staff steps
- Stairs to pool entrance
- Staff area
- Pool viewing area
- Viewing area entrance
- Plant room stairs
- Rear fire doors
- External plant room exit
- External front entrance

5. Compliance with Data Protection legislation

In its administration of its CCTV system, Swim Central complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018. Due regard is given to the data protection principles embodied in GDPR. These principles require that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed;
- f) processed in a manner that ensures appropriate security of the personal data, including protection

f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorized or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

6. Applications for disclosure of images

In order to locate the images on Swim Central's system, sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified. A request for images made by a third party should be made in writing to the Centre Manager. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation. Such disclosures will be made at the discretion of the Centre Manager, with reference to relevant legislation and where necessary.

Where a suspicion of misconduct arises the Centre Manager may provide access to CCTV images for use in staff disciplinary cases. The Centre Manager may provide access to CCTV images when sought as evidence in relation to discipline cases. A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

7. Retention of images

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 90 days from the date of recording. Images will be automatically overwritten after this point. Where an image is required to be held in excess of the retention period, the Centre Manager will be responsible for authorising such a request. Access to retained CCTV images is restricted to Daniel Wright and other persons as required and as authorised by the Centre Manager.

8. Complaints procedure

Complaints concerning the use of Swim Central's CCTV system or the disclosure of CCTV images should be made in writing to the Centre Manager at: info@swim-central.uk.

9. Monitoring compliance

All staff involved in the operation of Swim Central's CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein. All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

10. Policy review

Swim Central's usage of CCTV and the content of this policy shall be reviewed annually by the Centre Manager with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.