Synergy Gymnastics London
CCTV Policy

Approved by (role)	*Author*	*Date*
The Board members of Synergy Gymnastics London CIC	Andrew Payne	28/07/2026

Document History

Version	*Summary of Changes*	*Document Status*	*Date*
V1.0	Adoption of the CCTV Policy	Live	28/07/2026

Next Review Date:

August 2027

CCTV Privacy Policy: Synergy Gymnastics London CIC

1. Introduction and Purpose

This policy governs the operation of Closed-Circuit Television (CCTV) at **Synergy Gymnastics London CIC** and it's operations within the Sports Centre at Brunswick Park School. The system is operated to protect the premises, assets, staff, members, and visitors of the company.

The lawful bases for processing this visual data are **security** and **health and safety**, specifically:

- Preventing, deterring, and detecting crime, vandalism, and unauthorised access.
- Ensuring the personal safety of members, staff, and visitors.
- Monitoring equipment and apparatus to identify, assess, or investigate accidents, slips, or medical emergencies.

- Monitoring fire exits for obstacles to ensure clear access in an emergency.

2. System Scope and Camera Placement

The CCTV system is tightly controlled to respect individual privacy.

- **Authorised Coverage Area:** Cameras are positioned to capture **only the main gym area** where activity sessions take place and the **equipment storage cupboards** that can be accessed directly from the main gym area.
- **Exclusion Zones:** Cameras are strictly prohibited in the office, changing rooms, showers and toilets.
- **Monitoring Environment:** Authorised staff can view a camera live stream by using the Tapo app. Continuous live streaming is not recorded. The cameras only record and store footage when prompted by a member of staff.

3. Governance and Roles

- **ICO Registration:** Synergy Gymnastics London CIC is fully registered as a data controller with the Information Commissioner's Office (ICO Certificate number 00014647511).
- **Data Controller:** The designated Data Controller for the organisation is **Andrew Payne**.
- **Authorised Access Personnel:** Only the following named individuals are permitted to access, view, or export recorded footage:
    1. Andrew Payne
    2. Levent Charles
    3. Ava Buckley
    4. Karise Lee

4. Data Security and Storage

- **Retention:** Recorded footage can be securely stored in the Tapo Cloud or on a Micro SD card installed in the camera itself. Footage is automatically overwritten after a maximum period of **30 days**, unless required as evidence for an active, ongoing incident investigation. The Micro SD Card is password protected.
- **Disclosure for Investigations:** Recorded footage may be shared with the police or other relevant authorities where it is necessary and proportionate for the purpose of supporting an investigation, responding to a lawful request, or preserving evidence relating to an incident.

5. Individual Rights and Subject Access Requests (SARs)

Under data protection law, individuals (staff, gym members, or visitors) have the right to request a copy of any recorded footage in which they clearly appear.

- **Submitting a Request:** Requests must be made in writing directly to the Data Controller, Andrew Payne.
- **Timeline:** Valid requests will be processed free of charge and fulfilled within **one calendar month**, in accordance with UK statutory limits.
- **Third-Party Privacy:** Before footage is released, images of other identifiable individuals will be redacted or blurred to protect their privacy rights.

6. Policy Review

This policy will be reviewed annually by the board of directors of Synergy Gymnastics London CIC to ensure ongoing compliance with the UK General Data Protection Regulation (UK GDPR), the Data Protection Act, and current ICO guidelines.