



Closed Circuit Television (CCTV) Policy

Policy Name	Closed Circuit Television (CCTV) Policy
Version Date	August 2026
Drafted By	Data Proof Ltd
Authorised By	Club Chairman

Introduction

Sevenoaks Town FC ("the Club", "we", "our", "us") strive to provide a safe, secure, and inclusive environment for our members, officials, visiting teams, spectators and customers of our Club facilities. CCTV assists in achieving these aims.

Sevenoaks Town FC use Closed Circuit Television (CCTV) monitoring and recording for the prevention, identification and reduction of crime and antisocial behaviour, for safeguarding and security, and to assist with spectator management.

The CCTV system comprises of multiple fixed cameras with current locations as listed in Appendix A.

The Club will always ensure that CCTV is used legally, ethically, and in a way that will protect an individual's reasonable expectation of privacy. This policy sets out the rationale for the Club's use of CCTV, how and when images may be used, and the controls put in place to manage access to images.

General Principles:

The Club has the responsibility for the protection of its buildings, grounds and equipment as well as providing a safe and inclusive environments for its members, coaches, parents/guardians, visiting teams and officials, spectators, and users of its premises and facilities.

The Club owes a duty of care under the provision of Health & Safety and Welfare legislation.

The Club utilises CCTV systems with associated data management systems to support it in achieving these objectives.

CCTV images are captured in public areas and stored responsibly. The use of CCTV monitoring within public areas of the Club is limited to security, safety, and inclusivity purposes and does not violate the reasonable expectation to privacy as defined by law.

The use of CCTV cameras will be indicated to members and visitors to the Club using clear signage.

CCTV is used for:



- protecting the Club buildings and Club assets, both before, during and after Club opening hours
- assisting the Club's Safeguarding Officers in investigations into safeguarding complaints against any member, staff or visitor
- assisting the Club in maintaining an inclusive sporting environment through the reduction in anti-social and discriminatory behaviour during matches, and club activities
- ensuring the health and safety of staff, members, parents and visitors
- reducing the incidence of crime and anti-social behaviour (including theft and vandalism)
- supporting the Police and Local Authority in a bid to deter and detect crime
- supporting the Football Association (FA), County Association, and League Organisations in investigating incidents of antisocial or discriminatory behaviour during matches and club activities
- assisting in identifying, apprehending and prosecuting offenders
- ensuring that the Club policies are respected so that the Club can be properly managed
- ensuring compliance with our bar license

This list is not exhaustive. All use of CCTV security technologies and their purpose must be authorised by the Club Chairman in advance and documented appropriately.

Any unauthorised installation or use of CCTV by any member of the Club is strictly prohibited by this policy and may result in disciplinary action.

The use of CCTV cameras will be indicated to members, employees, and visitors to the Club using clear signage.

The Club will not engage in covert surveillance, and CCTV will not be used to monitor employee performance

Data Protection & Privacy:

The Club takes data protection and privacy seriously. The Club is registered as a data controller with the ICO (Reference: ZB107702) which includes our use of CCTV surveillance.

The Club will ensure that the installation, use, and coverage of CCTV will minimise any impact on an individual's reasonable expectation of privacy as defined in UK law.

The Club recognises that CCTV images may be considered personal data and are covered by UK Data Protection Legislation. The Club will support an individual's data protection rights in relation to CCTV images and audio recordings. Further information is included in our Privacy Notice published on our website at <https://www.sevenoakstownfc.co.uk/dataprotection>



The Club is the Data Controller for CCTV images captured within the Clubhouse and Stadium.

The Club also supports CCTV installations for Sevenoaks Town Council. The Council is the Data Controller for images and audio recorded by these cameras. For more information on their data processing, please review the Council's:

- Privacy Notice at <https://sevenoakstown.gov.uk/general-data-protection-regulation-gdpr/>
- CCTV Policy at <https://sevenoakstown.gov.uk/wp-content/uploads/2026/02/21-CCTV-policy-2.pdf>

Isthmian Football League Ltd may also capture match and crowd footage at Sevenoaks Town FC. Isthmian Football League Ltd is the Data Controller for such video footage. For more information, please review Isthmian Football League Ltd:

- Privacy Policy at <https://www.isthmian.co.uk/privacy-policy>

Management, Access, & Disclosure of CCTV recordings:

The Club have implemented appropriate technical and organisational controls to ensure that CCTV recordings are captured, stored, and disclosed appropriately

Monitoring & Access

CCTV cameras are monitored by Chairman, and access is controlled and monitored through the use of individual username and password with Multi factor authorisation. Access is only provided to individuals who have a legitimate need to access the recordings.

Retention of recordings

Unless the footage is required to support an investigation, all CCTV recordings are automatically overwritten on a 30-day rolling cycle. Any images, recordings, or audio retained to support an investigation will be subject to the Club's normal retention and deletion procedures.

Disclosure of recordings

Images, video footage, and recordings will only be disclosed to 3rd parties with authorisation from the Club Chairman. CCTV data will not generally be disclosed unless:

- satisfactory evidence is provided to the Club that the data is required to support legal proceedings
- satisfactory evidence is provided to the Club that the data is subject to a court order that has been produced
- the data is required by the insurers of the Club to support an insurance claim made by the Club or against the Club
- the data is required to support formal disciplinary procedures of the Football Association or a relevant County Association

When the data is disclosed to a 3rd Party, that 3rd Party becomes the Data Controller for the released media.



The Club will maintain a record of all Disclosure Requests and whether the data was provided or not.

The Club will not publish or post any CCTV images, recordings, or audio online and will not disclose such data to media organisations.

Data Subject Access Requests

The Club recognise that images, recordings, and audio captured by the CCTV camera installations is considered personal data. The Club recognises the rights of data subjects to request access to such data via data subject access requests. 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.

The Club reserves the right to refuse access to CCTV footage where this would prejudice the legal rights of other individuals or jeopardise an on-going investigation.

When giving an individual a copy of their data, the Club may provide a still/series of still pictures, a disk or other removable media, or access to a digital download with relevant images. However, 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.

Management of this policy:

This policy will be reviewed biennially, or when there is a material change to the usage of CCTV by the Club, or when a legislative change requires amendment.



Appendix A – Camera Locations & Functions

Camera Reference	Camera Location & Function
Stadium	Portacabin covering the exit gate.
Stadium	Portacabin covering the path from the stadium to the car park
Stadium	Turnstile covering the entrances to all the changing rooms and 3G pitch
Stadium	Portacabin cover the side path and the new building
Stadium	Portacabin looking from the Gents toilet door towards the park
Stadium	Portacabin looking out onto the 3G pitch
Stadium	All stadium cameras record 24 hours on a rolling 30 days, No sound.
New Building	Corner of the outside steps down the side of the building alongside the skateboard park - motion detection recording only with sound
Compound	Looking towards the double gates facing the outside car park - motion detection recording only with sound
On top of the Ken Newman stand	Covering the side of the new building and the new double gates - motion detection recording only with sound
New Building	Covering the outside park pitch - motion detection recording only with sound
Tea bar	Covering the back of the park - motion detection recording only with sound
Portacabin	Covering the front of the medical room - motion detection recording only with sound
Floodlight	Covering the far end of the 3G pitch side on - motion detection recording only with sound
Old Club House	Covering the car park - motion detection recording only with sound
New Building	Covering the Skateboard Park STC CCTV recording with sound on a rolling 30 days
New Building	Covering the road and path leading up to the new building STC CCTV recording with sound on a rolling 30 days



Portacabin

Covering the new playground and swings STC CCTV recording with sound on a rolling 30 days