

Holy Trinity CCTV policy

Date of adoption: 18.3.19

Date to be reviewed: 18.3.2022

Policy statement

Holy Trinity Church, Coventry uses a Closed Circuit Television System (“CCTV”) within the premises of the Church.

The purpose of this policy is to set out the position of Holy Trinity as to the management, operation and use of the CCTV at Holy Trinity.

This policy applies to all staff, members and visitors to Holy Trinity whose images may be captured by the CCTV system.

This policy takes account of all applicable legislation and guidance, including:

- The General Data Protection Regulation (“GDPR”)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

Purpose of CCTV

Holy Trinity uses CCTV for the following purposes:

- To provide a safe and secure environment for staff, members and visitors, including for the purposes of safeguarding children and vulnerable adults
- To prevent the loss of or damage to Church buildings and/or assets
- To assist in the prevention and detection of crime and to assist statutory authorities as required.

For clarity, the CCTV system shall not be used for other purposes

Description of system

Holy Trinity uses fixed cameras on site, and an automated 30 day image recording system. Cameras are not equipped for sound recording.

Siting of Cameras

All CCTV cameras are sited in such a way as to meet the purpose for which the CCTV is operated.

Cameras are sited in positions where they are visible.

Signs are posted to inform individuals that they are in an area within which CCTV is in operation.

Management and Access

The CCTV system will be managed by the Verger and IT Manager.

Viewing of live and recorded images on the CCTV system is restricted to Staff, Wardens, and appropriate volunteersⁱ for the reasons set out above.

No other individuals will have the right to view or access any CCTV images except in accordance with the terms of this policy as to disclosure of images.

Storage and Retention of Images

Any images recorded by the CCTV system will be retained only for as long as necessary for the purpose for which they were originally recorded.

Recorded images are stored for a period of 30 days unless there is a specific purpose for which they are retained for a longer period.

Holy Trinity will ensure that appropriate security measures are in place to prevent the unlawful or inadvertent disclosure of any recorded images. The measures in place include:

- CCTV recording systems being located in restricted access areas;
- The CCTV system being password protected;
- Restriction of the ability to make copies to specified members of staff and IT Manager.

Disclosure of Images to Data Subjects

Any individual recorded in any CCTV image is a data subject for the purposes of the Data Protection Legislation, and has a right to request access to those images.

If such a request is made the Verger will review the CCTV footage, in respect of relevant time periods where appropriate, in accordance with the request. The data subject must agree to attend Holy Trinity during office hours for a comparison image to be taken.

If the footage contains only the individual making the request then the individual will be permitted to view the footage. This must be strictly limited to that footage which contains only images of the individual making the request.

If the footage contains images of other individuals then Holy Trinity must consider whether the request requires the disclosure of the images of individuals other than the requester.

A record must be kept, and held securely, of all disclosures.

Disclosure of Images to Third Parties

Holy Trinity will only disclose recorded CCTV images to third parties where it is required or permitted to do so in accordance with the Data Protection and other Legislation.

CCTV images will only be disclosed to law enforcement agencies in line with the purposes for which the CCTV system is in place.

ⁱ Appropriate Volunteers are the IT Manager, Congregational Pastors, Parish Safeguarding Officer, Youth and Children's Leader, Lead Welcomers.