

CCTV POLICY

1. Introduction

1.1. Barrow Baptist Church has a closed circuit television (CCTV) system to provide a safe and secure environment for staff and visitors, and to protect its property.

1.2. This document sets out the accepted use and management of the CCTV system and images to ensure that Barrow Baptist Church complies with the Data Protection Act 2018 (GDPR), Human Rights Act 1998 (HRA) and other legislation.

1.3. This policy has been produced in line with the Information Commissioner's CCTV Code.

2. Purpose of CCTV

2.1. A CCTV system has been installed to:

- Deter crime
- Assist in the prevention and detection of crime
- Assist with the identification, apprehension and prosecution of offenders
- Monitor security of Barrow Baptist Church buildings and car park
- Monitor access and use of the premises.

2.2. The system will be provided and operated in a way that is consistent with an individual's right to privacy.

2.3. The System will hold recorded footage for a maximum of 30 days after this the data will be overwritten.

2.4. The system will not be used to:

- Provide images to the world-wide web
- Record sound
- Disclose to the media

3. Owner

3.1. The CCTV surveillance system is owned by Barrow Baptist Church.

3.2. The Church's appointed Data Protection Officer is responsible for the day-to-day operation of the system and ensuring compliance with this policy.

Overview of system

- The CCTV system includes four external cameras, located at strategic points. No cameras are placed within the rooms, other than during the temporary period of time when the church is acting as a food bank during the CoVID19 outbreak.
- The CCTV system runs 24 hours a day, 7 days a week.
- The CCTV system is managed by designated staff.
- CCTV signs will be prominently placed at the entrances of the building, to inform staff, visitors and members of the public that CCTV is in use.
- Although every effort has been made to ensure maximum effectiveness of the CCTV system it is not possible to guarantee that the system will detect every incident taking place within the area of coverage.

4. Data Protection Act 2018

4.1. For the purpose of the Data Protection Act 2018 Barrow Baptist Church is the data controller.

4.2. CCTV digital images, if they show a recognisable person, are personal data and are covered by the Data Protection Act 2018. This policy is associated with our Data Protection Policy, the provisions of which should be adhered to at all times.

4.3. Barrow Baptist Church is required to register its processing of personal data (including CCTV) with the Information Commissioner's Office (ICO).

4.4. Where new cameras are to be installed on the premises, Part 4 of the ICO's CCTV Code of Practice will be followed before installation.

- The appropriateness of and reasons for using CCTV will be assessed and documented;
- The purpose of the proposed CCTV system will be established and documented;
- Responsibility for day-to-day compliance with this policy will be established and documented.

5. Access to images

5.1. Access to images will be restricted to those staff and trustees that need to have access in accordance with the purposes of the system.

5.2. Disclosure of recorded material will only be made to third parties in strict accordance with the purposes of the system and is limited to the following: -

- Police and other law enforcement agencies where the images recorded could assist in a specific criminal enquiry and / or the prevention of terrorism and disorder.
- Prosecution agencies.
- Appropriate members of church staff or trustees (in the course of staff disciplinary proceedings (including prospective proceedings)) to ensure compliance with Barrow Baptist Church's regulations and policies.
- People whose images have been recorded and retained (unless disclosure to the individual would prejudice criminal enquiries).

5.3. Images that have been recorded may be viewed on site by the individual whose image has been captured and/or a uniformed police officer when responding to routine incidents which occurred on the same day. No copies may be taken off site. Details of these requests will be kept.

6. Individual access rights

6.1. The Data Protection Act 1998 gives individuals the right to access personal information about themselves, including CCTV images.

6.2. All requests for access to a copy of CCTV footage by individuals should be made in writing to the Church Data Protection Officer.

6.3. Requests for access to CCTV images must include the date and time the images were recorded, information to identify the individual, if necessary and proof of identity.

6.4. Barrow Baptist Church will respond promptly and at the latest within 40 calendar days of receiving sufficient information to identify the images requested.

6.5. If Barrow Baptist Church cannot comply with the request, the reasons will be documented. The requester will be advised of these in writing, where possible.

7. Access to images by third parties

7.1. Unlike Data Subjects, third parties who wish to have a copy of CCTV images (i.e. images not of the person making the request) do not have a right of access to images under the DPA, and care must be taken when complying with such requests to ensure that neither the DPA, HRA or the CCTV Policy are breached. As noted above, requests from third parties will only be granted if the requestor falls within the following categories:

- Law enforcement agencies (where the images recorded would assist in a specific criminal enquiry)
- Prosecution agencies
- Appropriate members of Barrow Baptist Church staff or trustees in the course of staff disciplinary proceedings (including prospective proceedings) to ensure compliance with its regulations and policies.

7.2. All third-party requests for access to a copy of CCTV footage should be made in writing to the Church Data Protection Officer. If a law enforcement or prosecution agency is requesting access they should make a request under Section 29 of the Data Protection Act 1998. Any other third party requesting access to CCTV footage should make a Subject Access Request.

8. Request to prevent processing

8.1. In addition to rights of access, Data Subjects also have rights under the DPA to prevent processing (i.e. monitoring and recording CCTV images) likely to cause substantial and unwarranted damage to that person, or prevent automated decision taking (i.e. through the use of visual recognition software) in relation to that person.

8.2. Should any person visiting Barrow Baptist Church have any concerns regarding the operation of the CCTV systems, the following procedure must be complied with:

- The Data Subject should be directed to the Church Data Protection Officer to determine whether the Data Subject is making a request to prevent processing or automated decision making. If the Church Data Protection Officer determines that the Data Subject is instead making a Subject Access Request, the procedure set out in paragraph 7.2 above will be followed.
- The Church Data Protection Officer will consider the request in consultation with the Trustees.
- The Church Data Protection Officer will provide a written response within 30 days of receiving the request to prevent processing or automated decision making, setting out the decision on the request. A copy of the request and response will be retained.

9. Retention and disposal

9.1. Unless required for evidential purposes or the investigation of crime or otherwise required by law, recorded images will be retained for no longer than 90 days from the date of recording.

10. Central responsibilities

10.1. The Trustees are responsible for approving and reviewing this policy.

10.2. The Church Data Protection Officer is responsible for compliance with and implementation of this policy.

11. Complaints regarding operation of system

11.1. Complaints regarding the CCTV system and its operation must be made in writing to the Church Data Protection Officer or Trustees.

This Policy statement was adopted at a virtual meeting of the Trustees on 29 April 2020 and will be reviewed annually.