**DIOCESE OF WESTMINSTER**



**CCTV POLICY**

|  |  |
| --- | --- |
| **Policy prepared by:** | Data Protection Officer |
| **Third Party Policy:** | Reviewed by Excello Law |
| **Approval of The Directors of the Trustee** |  |
| **Review Date** | 17 October 2022 |

**CCTV Policy**

# POLICY STATEMENT

* 1. The purpose of this Policy is to regulate the management, operation and use of the Closed Circuit Television (CCTV) systems in buildings owned and operated by the Diocese of Westminster.
	2. The Diocese of Westminster is the Data Controller in respect of all CCTV systems operated by parishes within the Diocese and is registered with the Information Commissioners Office. Cameras may be used to monitor activities within parish and diocesan buildings, on its sites, in its car parks for the purpose of security and the safety and well-being of the parish buildings, assets, parishioners, staff, volunteers and visitors.
	3. CCTV monitoring and recording systems will only be installed in or on parish property when this has been reviewed and approved by the Parish Priest. This must be compliant with this, Diocesan CCTV policy.
	4. Parishes using CCTV must comply with this CCTV policy, which may be modified in consultation and with the approval of the Data Protection Officer (DPO).
	5. Parishes using CCTV must inform the DPO prior to implementation of the CCTV system. Compliance with this policy will ensure that our use of CCTV meets the requirements of the UK-GDPR and the Data Protection Act 2018.
	6. Failure to comply with the policy may lead to an instruction to remove or change part or all of the CCTV equipment installed.

# PURPOSE AND INSTALLATION OF CCTV

* 1. The installation and use of CCTV should be carried out only where it is required for a clear identified purpose. Such purpose may include the security of the parish buildings, assets or the security and well-being of clergy, staff and visitors.
	2. Installation of CCTV should be carried out by a professional electrician or CCTV installer.
	3. The installation of CCTV should only be carried out once the correct permissions have been granted. You may need to get Listed Buildings consent and Historic Churches Committee consent. It is the responsibility of the parish to ensure that all such permissions have been obtained.
	4. Parishes must carry out a data protection impact assessment prior to the installation of any new CCTV system. This assessment must be reviewed and signed off by the DPO.
1. **SITING OF CAMERAS**

3.1 All CCTV cameras are to be sited in such a way as to meet the purpose for which the CCTV is operated. Cameras will be sited in prominent positions where they are clearly visible to staff and visitors and signage will be displayed in a prominent position.

3.2 Cameras will not be sited, so far as possible, in such a way as to record areas that are not intended to be the subject of surveillance. The parish/diocese should not have cameras looking past and recording areas outside of its premises and grounds.

3.3 Compliant signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

 3.4 Cameras will not be sited in areas where individuals have an enhanced expectation of privacy such as toilets, dressing rooms, confessionals etc.

3.5 Under no circumstances should CCTV pick up or record audio. Please note that CCTV must be separate from any Livestreaming system, which permits audio.

1. **CONTROL AND OPERATION OF IMAGES**

4.1 The management of the CCTV lies with the Parish Priest and individual(s) appointed by the Parish Priest.

4.2 The appointed individual(s) will be responsible for the checking of CCTV in the event that the images may need to be searched through to gather information or evidence relating to a specific event.

4.3 The CCTV operating system should be in a secure cabinet and systems must be password protected. Keys and passwords should remain in the possession and protection of the appointed individual(s).

1. **ACCESS TO IMAGES**

5.1 Recorded images are the personal data of the Individuals (Data Subjects) whose images have been recorded by the CCTV system.

5.2 Data Subjects have a right of access to their personal data under the UK GDPR and DPA 2018.

5.3 Data Subjects can exercise this or other rights by submitting a written request to either the parish or the diocese. All requests for CCTV images must be recorded in the CCTV Incident Log.

5.4 On receipt of the request, the parish should contact the DPO with the request. The DPO will co-ordinate the response to the Data Subject.

5.5 Third parties, such as police, insurers etc. will follow the same application process and the DPO will determine if disclosing the data is appropriate.

CCTV images may be released to law enforcement agencies where images are required for an investigation concerning national security, the prevention or detection of crime or the apprehension or prosecution of offenders, and that the investigation would be prejudiced by failure to disclose the information. Where images are sought by other bodies/agencies with a statutory right to obtain information, evidence of that statutory authority will be sought before CCTV images are disclosed.

5.6 The DPO will ascertain any material to be disclosed and ensure that the proper procedures to release the data have been followed.

1. **OPERATING STANDARDS**

6.1 No unauthorised persons should be permitted to access to the CCTV at any time.

6.2 Other than the responsible person, access to the CCTV controls, including remote devices, should be restricted to persons specifically authorised by the Parish Priest.

6.3 CCTV monitors should only be visible in the control room(s) and restricted to the responsible person(s).

 6.4 Images produced by the recording equipment must be as clear as possible so they are effective for the purpose for which they are intended.

6.5 CCTV equipment must contain a date and time stamp; systems without this information may not be used by the authorities conducting their investigations.

6.6 CCTV images are not to be retained for longer than necessary taking into account the purposes for which they are being processed. Modern automatic recording equipment should usually retain information for approximately 28 days.

6.7 Provided that there is no legitimate reason for retention of CCTV images, the images must be erased/self-erased following the expiration of the retention period.

 Policy issued: October 2022

To be reviewed: October 2023