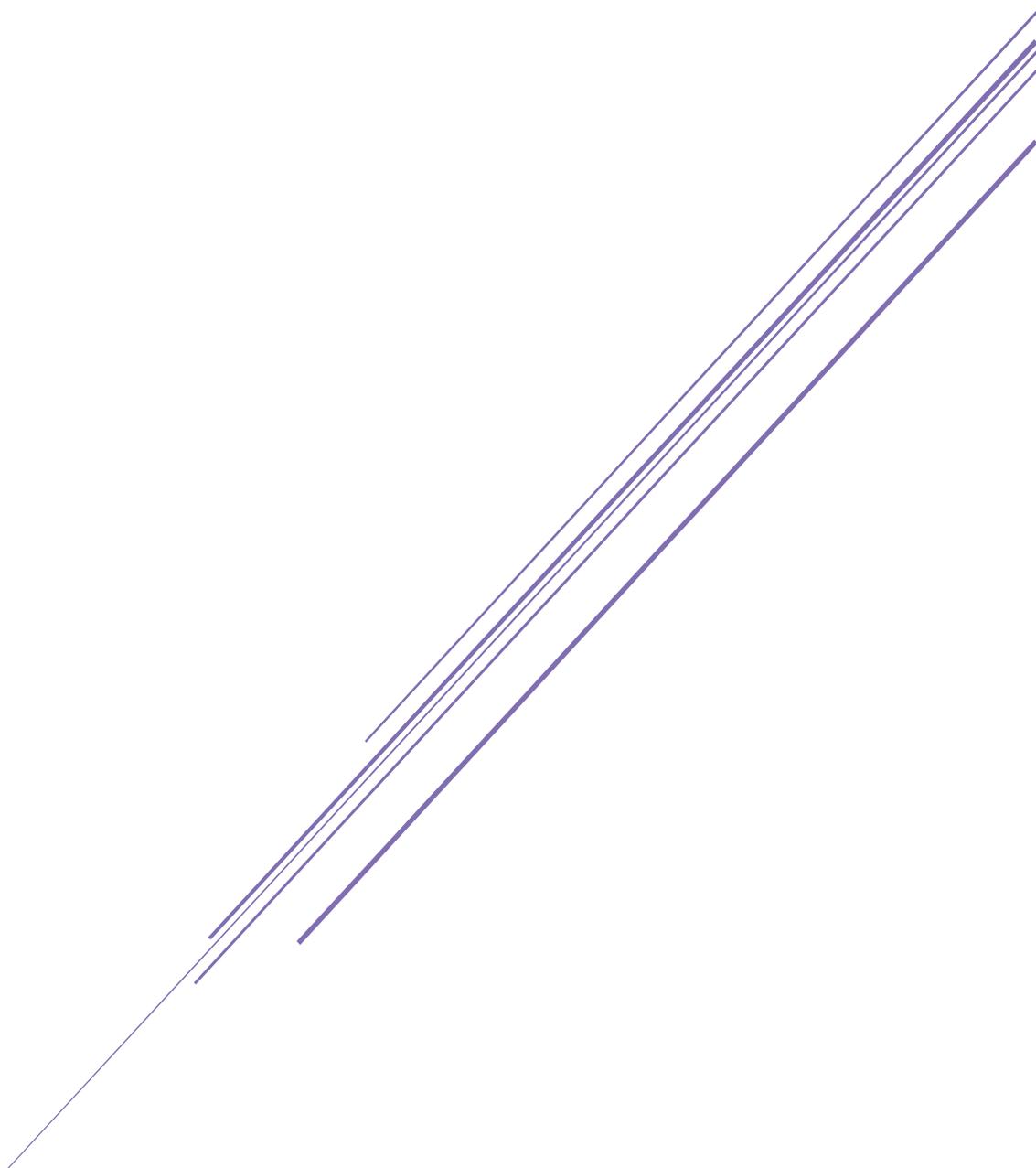


CCTV POLICY

Holy Trinity Church

2 Upper King Street
LE1 6XE



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Review History

Prepared by: Stephen Gorton, Kevin Maloney

Reviewed by:

Approved by _____ on _____

Next Review due:

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Definitions

CCTV – “Closed Circuit Television” –refers to any video equipment that is used to monitor and record activity for security purposes.

1 Introduction

- 1.1 Holy Trinity Leicester (HTL) recognises that CCTV systems can be privacy intrusive.
- 1.2 Review of this policy shall be repeated regularly, and whenever new equipment is introduced a review will be conducted and a risk assessment put in place. We aim to conduct reviews no later than every two years.
- 1.3 The purpose of the CCTV system is to assist HTL in reaching these objectives:
 - a) To protect staff, volunteers, contractors and visitors against harm to their person and/or property;
 - b) To increase a sense of personal safety and reduce the fear of crime;
 - c) To protect HTL buildings and assets;
 - d) To support the police in preventing and detecting crime;
 - e) To assist in identifying, apprehending and prosecuting offenders;
 - f) To assist in establishing cause of accidents and other adverse incidents and prevent reoccurrence;
 - g) To assist in managing the church.
- 1.4 The purpose of this Policy is to regulate the management, operation and use of the CCTV system (closed circuit television) at HTL. The system comprises the following cameras:
 1. Turner Street lobby
 2. Main Church / Turner Street door area
 3. Main Church (stage view)
 4. Main Church (sound desk view)
 5. Regent Road Yard Area (external)
 6. Foyer
 7. Main entrance
 8. *Bike Racks (external)*
 9. *North Window*
 10. *Regent Road 1 (external)*
 11. *Regent Road 2 (external)*
 12. Trinity Hall driveway (external)

All cameras are fixed position, non-swivel and video only.

2 Statement of Intent

- 2.1 Notification has been submitted to the Information Commissioner and the next renewal date has been recorded (see Data Protection Policy for dates).
- 2.2 The CCTV system will seek to comply with the requirements both of the GDPR and the most recent Commissioner's Code of Practice.
- 2.3 HTL will treat the system, all information, documents and recordings (both those obtained and those subsequently used) as data protected under the GDPR.
- 2.4 The system has been designed so far as possible to deny observation on adjacent private homes, gardens and other areas of private property.
- 2.5 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose.
- 2.6 Images will only be released to the media for use in the investigation of a specific crime with the written authority of the police. Images will never be released to the media for purposes of entertainment.
- 2.7 The planning and design has endeavoured to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident taking place in the areas of coverage.
- 2.8 Warning signs, as required by the Code of Practice of the Information Commissioner will be clearly visible on the site and make clear who is responsible for the equipment.
- 2.9 Recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated. In the absence of compelling a need to retain images for longer (such as an ongoing investigation or legal action), data will be retained for no longer than one month.

3 System Management

- 3.1 Access to the CCTV system and data shall be password protected.
- 3.2 The CCTV system will be administered and managed by James Banks, Deputy Operations Manager, who will act as System Manager and take responsibility for restricting access, in accordance with the principles and objectives expressed in this policy. In the absence of the Systems Manager the system will be managed by Stephen Gorton, Director of Operations or the present Incumbent.
- 3.3 The system and the data collected will only be available to the Systems Manager, his/her replacement and appropriate members of the senior leadership team, plus Churchwardens, as determined by the present Incumbent.
- 3.4 The CCTV system is designed to be in operation 24 hours each day, every day of the year, though HTL does not guarantee that it will be working during these hours.
- 3.5 The System Manager will check and confirm the efficiency of the system regularly and in particular that the equipment is properly recording and that cameras are functional.
- 3.6 Cameras have been selected and positioned so as to best achieve the objectives set out in this policy in particular by providing clear, usable images.
- 3.7 Unless an immediate response to events is required, cameras will not be directed at an individual, their property or a specific group of individuals, without authorisation in accordance with the Regulation of Investigatory Power Act 2000.

- 3.8 Where a person other than those mentioned in paragraph 3.3 above, requests access to the CCTV data or system, the System Manager must satisfy him/herself of the identity and legitimacy of purpose of any person making such request. Where any doubt exists access will be refused.
- 3.9 Details of all visits and visitors will be recorded in a system log book including time/data of access and details of images viewed and the purpose for so doing.

4 Downloading Captured Data onto Other Media

- 4.1 In order to maintain and preserve the integrity of the data (and to ensure their admissibility in any legal proceedings) any downloaded media used to record events from the hard drive must be prepared in accordance with the following procedures:
 - a) Each downloaded media must be identified by a unique mark.
 - b) Before use, each downloaded media must be cleaned of any previous recording.
 - c) The System Manager will register the date and time of downloaded media insertion, including its reference.
 - d) Downloaded media required for evidential purposes must be sealed, witnessed and signed by the System Manager, then dated and stored in a separate secure evidence store. If a downloaded media is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed and signed by the System Manager, then dated and returned to the evidence store.
 - e) If downloaded media is archived the reference must be noted.

- 4.2 Images may be viewed by the police for the prevention and detection of crime and by the Systems Manager, his/her replacement and the present Incumbent and other authorised members of the senior leadership team, plus Churchwardens. However, where one of these people may be later called as a witness to an offence and where the data content may be used as evidence, it shall be preferable if possible, for that person to withhold viewing of the data until asked to do so by the police.
- 4.3 A record will be maintained of the viewing or release of any downloaded media to the police or other authorised applicants.
- 4.4 Should images be required as evidence, a copy may be released to the police under the procedures described in this policy. Images will only be released to the police on the clear understanding that the downloaded media (and any images contained thereon) remains the property of the school, and downloaded media (and any images contained thereon) are to be treated in accordance with the GDPR. HTL also retains the right to refuse permission for the police to pass the downloaded media (and any images contained thereon) to any other person. On occasions when a Court requires the release of a downloaded media this will be produced from the secure evidence store, complete in its sealed bag.
- 4.5 The police may require HTL to retain the downloaded media for possible use as evidence in the future. Such downloaded media will be properly indexed and securely stored until they are needed by the police.
- 4.6 Applications received from outside bodies (e.g. solicitors or parents) to view or release images will be referred to the HTL's Data Protection Officer and a decision made by a senior leader of HTL in consultation with the HTL's data protection officer.

5 Complaints About the Use Of CCTV

- 5.1 Any complaints in relation to the church's CCTV system should be addressed to the Director of Operations.

6 Request for Access By The Data Subject

- 6.1 In line with HTL's Data Protection Policy, Data Subjects – those whose image has been captured by the CCTV system and can be identified - have a right to access data held about themselves, including those obtained by CCTV. Requests for such data should be made to the office in the first instance.