

INFORMATION LEAFLET FOR THE OPERATION OF CCTV AT HULL COMMUNITY CHURCH

This leaflet contains information and advice about the operation and management of the closed-circuit television (CCTV) systems at Hull Community Church. It also provides information relating to your data protection rights (currently the General Data Protection Regulation (“GDPR”) and the Data Protection Act 2018 (“DPA 2018”).

Policy statement

Hull Community Church uses Close Circuit Television (“CCTV”) within the premises. The purpose of this policy is to set out the position of Hull Community Church as to the management, operation and use of the CCTV.

This policy applies to all staff members, visitors to Hull Community Church and all other persons 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”)
- [Data Protection Act 2018] (together the Data Protection Legislation) (until 25th May 2018)
- CCTV Code of Practice produced by the Information Commissioner
- Human Rights Act 1998

Purpose of CCTV

Hull Community Church is open to members of the public as well as staff. The CCTV system is used to reduce crime and monitor the building to provide a safe and secure environment for staff and visitors, and to prevent the loss or damage to property and/or assets.

Description of system

The system comprises a number of fixed cameras and the system does not have sound recording capability.

Positioning of the Cameras

All CCTV cameras will 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.

Hull Community Church will make all reasonable efforts to ensure that areas outside of the premises are not recorded. Signs will be erected to inform individuals that they are in an area within which CCTV is in operation.

Cameras will not be sited in areas where individual have a heightened expectation of privacy, such as changing rooms or toilets.

Privacy Impact Assessment

Prior to the installation of any CCTV camera, or system, a privacy impact assessment will be conducted by Hull Community Church to ensure that the proposed installation is compliant with legislation and ICO guidance.

Hull Community Church will adopt a privacy by design approach when installing new cameras and systems, considering the purpose of each camera to avoid recording and storing excessive amounts of personal data.

Management and Access

Access to recorded images will be restricted to those staff authorised to view them and will not be made more widely available. There will always be at least two authorised members of staff present when accessing CCTV images.

A log of any access to the CCTV images, including time and dates of access, and a record of the individuals accessing the images, will be maintained by Hull Community Church.

Storage and Retention of CCTV images

Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 28 days from the date of recording. Images will be automatically overwritten after this point.

Hull Community Church 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 system being located in restricted access area;
- The CCTV system being encrypted/password protected;
- Restriction of the ability to make copies to specified members of staff

A log of any access to the CCTV images, including times and dates of access, and a record of the individual accessing the images, will be maintained by Hull Community Church.

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. Requests should be made by completing the Subject Access request form by emailing CCTVRequests@hullcommunitychurch.com. Please note Individuals cannot ask to see pictures or recordings of other people.

Hull Community Church will respond within 30 days of receiving the required information, either identifying the steps taken to comply with the request or setting out the reasons for refusing the request.

Individuals submitting requests for access will be asked to provide enough information to enable the footage relating to them to be identified. For example, date, time and location of recording, and a recent full-length colour photograph of the individual.

Hull Community Church 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.

A record must be kept, and held securely, of all disclosures which sets out:

- When the request was made;
- The considerations as to whether to allow access to those images;
- The individuals that were permitted to view the images and when; and
- Whether a copy of the images was provided, and if so to whom, when and in what format.

Disclosure of Images to Third Parties

Hull Community Church will only disclose recorded CCTV images to third parties in line with the GDPR and DPA 2018 in the following categories:

- legal representative of the Data Subject;
- law enforcement agencies including the Police;
- disclosure required by law or made in connection with legal proceedings.

Legal representatives of the Data Subjects are required to submit a letter of authority to act on behalf of the Data Subject to Hull Community Church and the subject access request form (please see Disclosure of Images to Data Subjects) together with the evidence of the Data Subject's identity.

A record of the date of any disclosure request along with details of who the information has been provided to (the name of the person and the organisation they represent), why they required it and how the request was dealt with will be made and kept, in case of challenge.

Data will be provided to those requests in a permanent format where possible. If this is not possible the third party will be offered the opportunity to view the footage.

Requests should be made by emailing CCTVRequests@hullcommunitychurch.com or by calling (01482) 470125.

Review of Policy and CCTV System

The CCTV system and the privacy impact assessment relating to it will be reviewed bi-annually.

Complaints

Any complaints relating to this policy or to the CCTV system should be sent to Hull Community Church using the contact details below.

Hull Community Church,
310 Newland Avenue,
Hull HU5 2NB
welcome@hullcommunitychurch.com

If you're still not happy, you can refer your complaint to the Information Commissioner's Office. For more details you can visit their website at <https://ico.org.uk/make-a-complaint>.