



Roman Catholic Archdiocese of Southwark
CCTV Policy



Index

1) Policy Statement.....	2
2) Purpose of CCTV and Installation	3
3) Siting of Cameras.....	3
4) Control and Operation of Images.....	4
5) Access to Images.....	4
6) Operating Standards.....	6
7) Useful Links.....	7



Policy Statement

- 1.1) 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 Roman Catholic Archdiocese of Southwark. Cameras are used to monitor activities within parish and diocesan buildings, on its sites, its car parks and other public areas to identify criminal activity actually occurring, anticipated, or perceived, and for the purpose of securing the safety and well-being of the diocese or parish buildings, parishioner, staff, volunteers and visitors.
- 1.2) 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 and finance/building committees.
- 1.3) Parishes using CCTV must ensure that a policy is in place which is bespoke to their specific needs or problems.
- 1.4) Parishes or Diocesan departments using CCTV must inform the Information Commission Office (ICO), of their use of CCTV and must register their CCTV policy under the terms of the Data Protection Act 1998. The use of CCTV must comply with the requirements of the Data Protection Act and, where applicable, the Regulation of Investigatory Powers Act 2000.
- 1.5) This policy document will be subject to review annually. Any amendments to this policy will be notified to parishes and diocesan departments via the finance office news
- 1.6) Failure to comply with the policy may lead to the Diocese issuing instruction to remove or change part or all of the CCTV equipment installed.



Purpose and Installation of CCTV

- 2.1) The installation and use of CCTV should be carried out for the purposes of the safety and security of parish/diocese buildings and the people using parish or diocesan property.
- 2.2) Installation of CCTV should be carried out by a professional electrician or CCTV installer. If you require information regarding suitable installers please contact Roy Collier, the Diocesan Health and Safety Manager roycollier@rcaos.org.uk
- 2.3) The installation of CCTV should only be carried out once the correct permissions have been granted. Listed buildings consent and Historic Churches Committee consent may need to be sought dependant on the status of the building. Consent from the Diocese finance office will need to be sought if the installation off CCTV and recording equipment is in excess of £10,000 including VAT.

Siting of Cameras

- 3.1) All CCTV cameras should 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.
- 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 make all reasonable efforts to ensure that areas outside of its premises and grounds are not recorded.
- 3.3) 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 a heightened expectation of privacy such as toilets or dressing rooms.



Control and Operation of Images

- 4.1) The management of the CCTV should be granted to a single individual. This should be a clergy member, staff member or individual of the parishes buildings committee.
- 4.2) The selected individual should take responsibility 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. Their contact details to also be displayed on a notice nearby should anyone wish to make contact.
- 4.3) Where possible a lock should be put on the cabinet where the CCTV operating system is kept and systems should be password protected. Keys and passwords should remain in the possession and protection of the responsible individual.

Access to Images

- 5.1) Recorded images are considered to be 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 the personal data under the GDPR and DPA 2018. They also have other rights under the GDPR and DPA 2018 in certain limited circumstances, including the right to have their personal data erased, rectified, to restrict processing and to object to the processing of their personal data.
- 5.3) Data Subjects can exercise these rights by submitting a request to the parish/diocese in writing.
- 5.4) On receipt of the request, the individual responsible for the CCTV should contact the Diocese Health and Safety Manger regarding compliance with the request. The Diocese Health and Safety Manager will communicate advice regarding the decision to give access to the image to the Data subject. This will be done without undue delay.



- 5.5) Third party requests for access will usually only be considered 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.
 - HR and Safeguarding staff responsible for employees.
- 5.6) Legal representatives of the Data Subjects are required to submit a letter of authority to parishes/diocese stating they are acting on behalf of the Data Subject regarding the subjects access request.
- 5.7) The Individual responsible for the CCTV will only release recorded images to law enforcement agencies including the Police once in possession of a form certifying that the images are required for either, 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.
- 5.8) Every disclosure of CCTV images should be recorded in a CCTV Operating Log Book which should contain the following:
- The name of the police officer or other relevant person in the case of other agencies/bodies receiving the copy of the recording
 - Brief details of the images captured by the CCTV to be used in evidence
 - The crime reference number where relevant
 - The date and time the images were handed over.



Operating Standards

- 6.1) The operation of CCTV used within the Diocese must be conducted in line with this policy.
- 6.2) No unauthorised access to the CCTV should be permitted at any time.
- 6.3) Other than the responsible person, access to the CCTV controls should be restricted to:
- Persons specifically authorised by the Parish Priest/ Diocesan Property Manager
 - Site staff e.g. - Caretaker
 - Maintenance engineers
 - Police officers where appropriate
 - Any other person with statutory powers of entry.
- 6.4) CCTV monitors must not be visible outside of the control room.
- 6.5) Before permitting access to the CCTV controls, the responsible person should satisfy themselves of the identity of any visitor and existence of the appropriate authorisation. All visitors are required to complete and sign a visitor's log, which must include details of their name, department and/or the organisation that they represent, the person who granted authorisation and the times of access to the CCTV system.
- A log of shall be retained setting out the following:
- Person reviewing recorded footage
 - Time, date and location of footage being reviewed
 - Purpose of reviewing the recordings.
- 6.6) Images produced by the recording equipment must be as clear as possible so they are effective for the purpose for which they are intended.
- 6.7) CCTV images are not to be retained for longer than necessary, taking into account the purposes for which they are being processed. Automatic recording equipment should usually retain information for approximately 28 days



- 6.8) Provided that there is no legitimate reason for retention of CCTV images (such as for use in disciplinary and/or legal proceedings), the images must be erased following the expiration of the retention period.
- 6.9) All retained CCTV images must be stored securely.

Useful Links

Useful links The Information Commissioner's Code of Practice can be found at:
<https://ico.org.uk/media/for-organisations/documents/1542/cctv-code-of-practice.pdf>

The Home Office Code can be found at:
<https://www.gov.uk/government/publications/surveillance-camera-code-of-practice>