

# CCTV policy – Trinity United Reformed Church High Wycombe

<b>Purpose:</b>	• To prevent or take action relating to crime against the building or those using it
	• To make visitors, volunteers and staff safer
	• To allow us to monitor and deal with breaches of contractual compliance with lettings agreements
<b>Policy maintenance and review:</b>	• To be reviewed every two years or when the law changes.
	• The Elders as Trustees act as Data Controller and are responsible for approving and reviewing this policy.
<b>Associated policies</b>	• Data Privacy Statement

## System control:

1. The system will be controlled by The Property Officer and up to two named deputies.
2. Images will be automatically recorded continuously or once movement has been detected.
3. If unauthorised movement has been detected by the Property Officer or his/her deputies, the police will be called to investigate if appropriate.
4. Images may be viewed by The Property Officer or named deputies if they consider that this is necessary related to our purpose stated above.
5. Images may be viewed and passed to the police if a crime has been committed.
6. Data will be kept for up to three months, after which it will be overwritten, unless it is subject to a police investigation. However, images used as evidence which result in a conviction are required by law to be kept securely for the duration of the sentence, which could be more than 20 years. Such images will be securely locked away physically or electronically.
7. The recorder box will be securely locked away and recordings/still pictures are securely stored with access regulated and controlled.
8. Recordings/still pictures should have the time and date superimposed on the image.
9. The system will not be used to provide images to the world-wide web, or record sound, or disclose images to the media

## Subject Access Requests

- To be made to the Elders via the church secretary (trinity.urchurchsecretary@gmail.com). Such requests will be dealt with within 40 days and an administration charge of £10 will be made. CCTV image or video extracts for a Subject Access Request will be encrypted and sent electronically to the data subject; once the data subject confirms receipt of the file(s),
- The Elders will disclose the password to allow decryption of the extracts.
- Requests for access to CCTV images must include (a) The date and time the images were recorded, (b) Information to identify the individual, if necessary and (c) Proof of Identity.

## Access to images by third parties

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 General Data Protection Regulation (GDPR). Care must be taken when complying with such requests to ensure that neither the GDPR, Human Rights Act nor the CCTV Policy are breached. 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 Trinity staff or trustees in the course of staff disciplinary proceedings (including prospective proceedings) to ensure compliance with Trinity’s regulations and policies.

*The Elders, Trinity United Reformed Church, London Road, High Wycombe HP11 1BJ*