

Templum Domini Jesu The Dutch Church 7 Austin Friars London EC2N 2HA

CCTV Policy

Issued: July 2018 Revised: n/a

Images recorded by surveillance systems are personal data which must be processed in accordance with data protection law. The Dutch Church is committed to complying with its legal obligations and ensuring that the privacy rights are recognised and respected.

This policy outlines why we use CCTV, how we will use CCTV and how we will process data recorded by CCTV cameras to ensure we are compliant with data protection law and best practice.

This policy covers all employees, volunteers, trustees, contractors and members of the public who visit the Dutch Church. It does not form part of any contract of employment and we may amend it at any time.

If you have any questions or concerns about this policy please contact the Dutch Church via trustees@dutchchurch.org.uk.

1. Reasons for the use of CCTV

The Dutch Church uses CCTV in the specific sites identified below. We believe that such use is necessary for legitimate business purposes including to:

- deter crime and protect its assets and the assets of its visitors from damage, vandalism and other crime; and
- support law enforcement bodies in the prevention, detection and prosecution of crime.

This list is not exhaustive and other purposes may be or become relevant.

2. Position of cameras

CCTV monitors the Library and the Artist Entrance of the Dutch Church 24 hours a day and this data is continuously recorded.

Camera locations are chosen to minimise viewing of spaces not relevant to the legitimate purpose of the monitoring.

The CCTV system does not record sound.

Images are monitored by authorised personnel 24 hours a day, every day of the year.

3. How we will operate any CCTV

Where CCTV cameras are positioned, signs are displayed at the entrance of the surveillance zone to alert individuals that their image may be recorded. Such signs will contain details of the organisation operating the system, the purpose for using the surveillance system and who to contact for further information, where these things are not obvious to those being monitored.



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We will ensure that live feeds from cameras and recorded images are only viewed by approved members of staff whose role requires them to have access to such data. This may include the Trustees and/or the Consultants of the Dutch Church in the Netherlands ("Consulenten") involved with disciplinary or grievance matters. Recorded images will only be viewed in designated, secure offices.

4. Use of data gathered by CCTV

In order to ensure that the rights of individuals recorded by the CCTV system are protected, we will ensure that data gathered from CCTV cameras is stored in a way that maintains its integrity and security. This may include encrypting the data, where it is possible to do so.

We may engage data processors, that is any person or organisation that is not an employee whose work involves processing of personal data that processes data on the Dutch Church's behalf and in accordance with the Dutch Church's instructions (for example a supplier which handles data on our behalf), to process data on our behalf. We will ensure reasonable contractual safeguards are in place to protect the security and integrity of the data.

5. Retention and erasure of data gathered by CCTV

Data recorded by the CCTV system will be stored in a locked cabinet in an office with restricted access. Data from CCTV cameras will not be retained indefinitely but will be permanently deleted once there is no reason to retain the recorded information. Exactly how long images will be retained for will vary according to the purpose for which they are being recorded. For example, where images are being recorded for crime prevention purposes, data will be kept long enough only for incidents to come to light. We will maintain a comprehensive log of when data is deleted.

At the end of their useful life, all images stored in whatever format will be erased permanently and securely. Any physical matter such as tapes or discs will be disposed of as confidential waste. Any still photographs and hard copy prints will be disposed of as confidential waste.

6. Use of additional CCTV cameras

Prior to placing a new CCTV camera in a location, we will carefully consider if it is appropriate by carrying out an impact assessment.

This is intended to assist us in deciding whether new cameras are necessary and proportionate in the circumstances and whether they should be used at all or whether any limitations should be placed on their use.

Any assessment will consider the nature of the problem that we are seeking to address at that time and whether a CCTV camera is likely to be an effective solution, or whether a better solution exists.



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In particular, we will consider the effect the CCTV camera will have on individuals and therefore whether its use is a proportionate response to the problem identified.

No surveillance cameras will be placed in areas where there is an expectation of privacy (for example, in areas of worship) unless, in very exceptional circumstances, it is judged by us to be necessary to deal with very serious concerns.

7. Covert monitoring

We will never engage in covert monitoring or surveillance (that is, where individuals are unaware that the monitoring or surveillance is taking place) unless, in highly exceptional circumstances, there are reasonable grounds to suspect that criminal activity or extremely serious malpractice is taking place and, after suitable consideration, we reasonably believe there is no less intrusive way to tackle the issue.

In the unlikely event that covert monitoring is considered to be justified, it will only be carried out with the express authorisation of the Trustees and/or Consulenten. The decision to carry out covert monitoring will be fully documented and will set out how the decision to use covert means was reached and by whom. The risk of intrusion on innocent individuals will always be a primary consideration in reaching any such decision.

Only limited numbers of people will be involved in any covert monitoring.

Covert monitoring will only be carried out for a limited and reasonable period of time consistent with the objectives of making the recording and will only relate to the specific suspected illegal or unauthorised activity

8. Requests for disclosure

No images from our CCTV cameras will be disclosed to any third party, without express permission being given by the Trustees. Data will not normally be released unless there is satisfactory evidence that it is required for legal proceedings or under a court order.

In other appropriate circumstances, we may allow law enforcement agencies to view or remove CCTV footage where this is required in the detection or prosecution of crime.

We will maintain a record of all disclosures of CCTV footage.

No images from CCTV will ever be posted online or disclosed to the media.

9. Subject Access Requests

People may make a request for the personal information that the Dutch Church holds about them and this may include CCTV images. A data subject access request is subject to the legal conditions in place from time to time. If you have any questions about a request please contact the Dutch Church via trustees@dutchchurch.org.uk.



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In order for us to locate relevant footage, any requests for copies of recorded CCTV images must include the date and time of the recording, the location where the footage was captured and, if necessary, information identifying the individual.

We reserve the right to obscure images of third parties when disclosing CCTV data as part of a subject access request, where we consider it necessary to do so.

10. Requests to restrict processing

We recognise that, in rare circumstances, individuals may have a legal right to object to processing. If you need further information about this please contact the Dutch Church via trustees@dutchchurch.org.uk.

This policy will be regularly reviewed to ensure that it meets legal requirements and relevant guidance published by the Information Commissioner's Office.