

CCTV Policy

The purpose of this policy is to regulate the management and operation of the Closed-Circuit Television (CCTV) System in place at Tonbridge Baptist Church. It also serves as a notice and a guide to data subjects, (including employees, contractors, visitors and members of the public) regarding their rights in relation to personal data recorded via the CCTV system.

The system is administered and managed by Tonbridge Baptist Church, who act as the Data Controller. This policy will be subject to review from time to time and should be read with reference to Tonbridge Baptist Church's Data Protection Policy. For further guidance, please review the Information Commissioner's CCTV Code of Practice.

All fixed cameras are in plain sight on Tonbridge Baptist Church premises and Tonbridge Baptist Church does not routinely use CCTV for covert monitoring of private property outside Tonbridge Baptist Church grounds.

1. Reception Desk (covers reception area)
2. Entrance car park (covers front entrance and car park)
3. Alley (covers the fire exit from Derwent and the pathway)
4. Speyside (covers along Speyside)
5. Darenth 1 (covers the Fire exit door)
6. Darenth 2 (covers the Fire exit door and pathways)
7. Derwent Road (covers Fire exits to Worship Room and the Boiler Room)
8. Main car park (covers the path and car park)

Tonbridge Baptist Church's purposes for using CCTV are set out below and, having fully considered the privacy rights of individuals, Tonbridge Baptist Church believes these purposes are all in its legitimate interests. Data captured for the purposes below will not be used for any commercial purpose.

1. Objectives of the system

- 1.1 To protect Tonbridge Baptist Church's buildings and equipment, and the personal property of employees, Contractors, visitors and members of the public.
- 1.2 To protect employees, contractors, visitors and members of the public regarding their personal safety.
- 1.3 To support the police and community in preventing and detecting crime and assist in the identification and apprehension of offenders.
- 1.4 To monitor the security and integrity of Tonbridge Baptist Church's site deliveries and arrivals.
- 1.5 To monitor staff and contractors when carrying out work duties

2. Positioning

- 2.1 Locations have been selected, both inside and out that Tonbridge Baptist Church reasonably believes require monitoring to address the stated objectives.

- 2.2 Adequate signage has been placed in prominent positions to inform employees, contractors, visitors and members of the public that they are entering a monitored area, identifying Tonbridge Baptist Church as the Data Controller and giving contact details for further information.
- 2.3 No images will be captured from areas in which individuals would have a heightened expectation of privacy, including changing and washroom facilities.
- 2.4 No images of public spaces will be captured except to a limited extent at site entrances.

3. Maintenance

- 3.1 The CCTV system will be operational 24 hours a day, every day of the year.
- 3.2 The Events & Premises Manager (defined below) will check and confirm that the system is properly recording and that cameras are functioning correctly, on a regular basis.

4. Supervision of the System

- 4.1 Staff authorised by Tonbridge Baptist Church to conduct routine supervision of the system.
- 4.2 Images will be viewed and/or monitored in a suitably secure and private area to minimise the likelihood of or opportunity for access to unauthorised persons.

5. Storage of Data

- 5.1 The day- to-day management of images will be the responsibility of the Events & Premises Manager who will act as the System Manager, or such suitable person as System Manager shall appoint in his or her absence.
- 5.2 Images will be stored for 30 days, and automatically over-written unless Tonbridge Baptist Church considers it reasonably necessary for the pursuit of the objectives outlined above, or if lawfully required by an appropriate third party such as the police or local authority.
- 5.3 Where such data is retained, it will be retained in accordance with the Act and our Data Protection Policy. Information including the date, time and length of the recordings, as well as the locations covered, and groups of individuals recorded, will be recorded in the system logbook.

6. Access to Images

- 6.1 Access to stored CCTV images will only be given to authorised persons, under supervision of the System Manager, in pursuance of the above objectives (or if there is some other overriding and lawful reason to grant such access).
- 6.2 Individuals have the right to access personal data Tonbridge Baptist Church holds on them (please see the Data Protection Policy), including information held on the system, if it has been kept. Tonbridge Baptist Church will require specific details including at least the time, date and camera location before it can properly respond to such



requests. This right is subject to certain exemptions from access, including in some circumstances where others are identifiable.

6.3 The System Manager must satisfy themselves of the identity of any person wishing to view stored images or access the system and the legitimacy of the request. The following are examples when the System Manager may authorise access to CCTV images:

6.3.1 Where required to do so by the Police or some relevant statutory authority?

6.3.2 To make a report regarding suspected criminal behaviour

6.3.3 To data subjects (or their legal representatives) pursuant to an access request under the Act and on the basis set out in 6.2 above.

6.3.4 To Tonbridge Baptist Church's insurance company where required in order to pursue a claim for damage done to insured property; or

6.3.5 In any circumstances required under law or regulation.

6.4 Where images are disclosed under 6.3 above a record will be made in the system logbook including the person viewing the images, the time of the access, the reason for viewing images, the details of images viewed and a crime incident number (if applicable).

6.5 Where images are provided to third parties under 6.3 above, wherever practicable steps will be taken to obscure images of non-relevant individuals.

7. Other CCTV Systems

7.1 Tonbridge Baptist Church does not own or manage third party CCTV systems but may be provided by Third parties with images of incidents where this is in line with the objectives of Tonbridge Baptist Church own CCTV policy.

8. Complaints and queries

8.1 Any complaints or queries in relation to Tonbridge Baptist Church's CCTV system, or its use of CCTV, or requests for copies, should be referred to the Events & Premises Manager.