

CCTV Policy

Name of your Gurdwara

Address of you Gurdwara

Telephone No XXXXXXXXXX

Registered Charity Number XXX XXX

The aim of this policy is to communicate the commitment of the trustees to the promotion of the CCTV policy at NAME OF THE GURDWARA and the hereinafter referred to as the XXXXX.

XXXXX align their principles and code of conduct on religious matters in line with Rehat Maryada.

**Privacy and Human Rights and Data Protection**

Nothing contained within this policy overrides the current and ongoing commitment of XXXXX to adhere to the Safeguarding of worshippers, vulnerable adults or members of staff. This policy along with all others should be read in conjunction with the main ‘Safeguarding’ policy.

***“Safeguarding of the worshippers, vulnerable adults and members of staff is at the forefront of everything we do”.***

The CCTV system will be operated with due regard to Article 8 of Human Rights Act 1998 whereby everyone has the right to respect for his or her private and family life and their homes.

All data will be processed in accordance with the principles of the Data Protection Act 1998 and Data Protection Act 2018 which, in summarised form, includes, but is not limited to:

Data Protection Act 1998

* All personal data will be obtained and processed fairly and lawfully.
* Personal data will be held only for the purposes specified.
* Personal data will be used only for the purposes, and disclosed only to the people, shown within this policy.
* Only personal data will be held which is adequate, relevant and not excessive in relation to the purpose for which it is held.
* Personal data will be held for no longer than is necessary. For CCTV currently it is for 15 days, and stored for a longer period on a DVD or external media if required for evidential purposes.
* Procedures will be implemented to put in place security measures to prevent unauthorized or accidental access to, alteration, disclosure, or loss and destruction of, information.

**Data Protection Act 2018**

* This Act makes provision about the processing of personal data.
* Most processing of personal data is subject to the GDPR.
* Part 2 supplements the GDPR (see Chapter 2) and applies a broadly equivalent regime to certain types of processing to which the GDPR does not apply (see Chapter 3).
* Part 3 makes provision about the processing of personal data by competent authorities for law enforcement purposes and implements the Law Enforcement Directive.
* Part 4 makes provision about the processing of personal data by the intelligence services.
* Part 5 makes provision about the Information Commissioner.
* Part 6 makes provision about the enforcement of the data protection legislation.
* Part 7 makes supplementary provision, including provision about the application of this Act to the Crown and to Parliament.

**1 Introduction**

1.1 The purpose of this Policy is to regulate the management, operation and use of the closed-circuit television (CCTV) system at NAME OF THE GURDWARA hereafter referred to as **‘**XXXXX**’**

1.2 The system comprises a number of cameras located around XXXXX site both inside and outside. All cameras are monitored within XXXXX.

1.3 This policy follows Data Protection Act 1998 guidelines.

1.4 This policy will be subject to annual review.

1.5 The CCTV system is owned by XXXXX.

The CCTV service is registered with the information commissioner ICO.

This CCTV system and the images produced by it are controlled by main nominated person in conjunction with two nominated deputies. They are responsible for how the system is used and for notifying the information commissioner about the CCTV system and its purpose (which is a legal requirement of the Data Protection Act 1998). They are listed in Appendix A1.

We (XXXXX) have considered the need for using CCTV and have decided it is required for the prevention and detection of crime and for protecting the safety of users of the XXXXX premises. The CCTV cameras have been sited after getting professional advice and the approval of the management committee. If there are any concerns they should be brought to the attention of the managing committee.

**2 Objectives of the CCTV System**

2.1 The objectives of the CCTV system are:

* To protect XXXXX buildings and their assets.
* To increase personal safety for worshippers, visitor & staff and reduce the fear of crime.
* To support the Police in a bid to deter and detect crime.
* To assist in identifying, apprehending and prosecuting offenders.
* To protect members of the public and private property and
* To assist in managing XXXXX.

**3 Statement of Intent**

3.1 The CCTV system will be registered with the Information Commissioner ICO under the terms of the Data Protection Act 1998 and Data Protection act 2018. It will also will seek to comply with the requirements of both the Data Protection Act and Commissioner’s Code of Practice.

3.2 XXXXX will treat the system and all information, documents and recordings obtained and used as data, which is protected by the Act.

3.3 Cameras will be used to monitor activities within XXXXX and 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 wellbeing of XXXXX, worshippers, staff and visitors.

3.4 Staff have been instructed that static cameras are not to focus on private homes, gardens and other areas of private property.

3.5 Unless an immediate response to events is required, staff must not direct cameras at an individual, their property or a specific group of individuals, without authorisation being obtained from the authorised person or a member of the Senior Leadership Team (SLT).

3.6 Materials or knowledge secured as a result of CCTV will not be used for any commercial purpose. Tapes will only be released to the media for use in the investigation of a specific crime and with the written authority of the police. Tapes will never be released to the media for purposes of entertainment.

3.7 The planning and design has endeavored to ensure that the system will give maximum effectiveness and efficiency but it is not possible to guarantee that the system will cover or detect every single incident-taking place in the areas of coverage.

3.8 Warning signs, as required by the Code of Practice of the Information Commissioner have been placed on XXXXX site.

3.9 This policy will be subject to review and amendment in requirement with any changes to the Code of Practice or changes in relevant acts such as Human rights Act and Data protection Act.

**4 Operation of the System**

4.1 The System will be administered and managed by the authorized person, in accordance with the principles and objectives expressed in the policy.

4.2 The day-to-day management will be the responsibility the named 1authorised persons.

4.3 The viewing monitor will be staffed by XXXXX Administrator during working hours.

4.4 The CCTV system will be operated 24 hours each day, every day of the year.

4.5 The nominated and authorised person will check and confirm the efficiency of the system quarterly and in particular that the equipment is properly recording and that cameras are functional. A quarterly check that the date and time stamp recorded on the images is correct will also be carried out.

4.6 Performance monitoring, the nominated and authorised person may carry out including random operating checks.

4.7 A regular maintenance programme is in place and maintenance will be carried out annually or as required and replacement of obsolete equipment will be given due consideration.

4.8 Access to the CCTV System is limited to the 1authorised persons.

4.9 Visitors and other contractors wishing to access the CCTV System area must be properly identified by the operating staff and the purpose of their visit must be established. Where any doubt exists, access will be denied. Any visit may be immediately curtailed if prevailing operational requirements make this necessary.

4.10 If out of hours emergency maintenance arises, the nominated person must be satisfied of the identity and purpose of contractors before allowing access.

4.11 Access to the CCTV system is restricted to authorised persons only and the cupboard must be kept locked at all times.

4.12 Emergency procedures will be used in appropriate cases to call the emergency services.

4.13 The authorised nominated persons have permission to access the system remotely if required.

**5 Liaisons**

5.1 Liaison meetings may be held with all bodies involved in the support of the system i.e. safety neighborhood team.

**6 Monitoring**

6.1 Camera surveillance may be maintained at all times

6.2 A monitor is installed in the Main Office to which pictures will be continuously recorded. Plus another one in Minister of Religions room and in the Main hall

6.3 On occasions XXXXX will use the CCTV systems to undertake “Directed” surveillance providing the purpose of such surveillance is compatible with the provisions contained within the Act. It is anticipated that the majority of such surveillance will be

* For the purpose of preventing or detecting crime or preventing disorder.
* In the interests of public safety.
* For the purpose of protecting worshippers, visitors and staff.
* If required for safety purposes or if they feel it is required, the nominated persons can remotely monitor the site.

All occasions of “Directed” surveillance must be done by authorised nominated persons or as authorised by the nominated persons.

**7 Image procedures**

7.1 The medium on which we record images is digital.

7.2 In order to maintain and preserve the integrity of the images recorded from the hard drive and the facility to use them in any future proceedings, the following procedures for their use and retention must be strictly adhered to:

* Copies may only be made by the authorised person
* Each recording / image must be identified by a unique mark.
* Before using, each recording medium (e.g.: CD/USB Memory Stick) must be cleaned of any previous recording.
* Any recording/image required for evidential purposes must be sealed, witnessed, signed by the Authorised person, dated and stored in a separate, secure, evidence store. If this is not copied for the police before it is sealed, a copy may be made at a later date providing that it is then resealed, witnessed, signed by the authorised person, dated and returned to the evidence store.
* If the recording / image is archived the reference must be noted.

7.3 Any recording / image may be viewed by the Police for the prevention and detection of crime and / or authorised officers of Gloucestershire County Council for supervisory purposes, authorised demonstration and training.

7.4 Any request to view or copy a recording/image must be made in writing specifying (as far as possible) the date and time of the image(s). XXXXX must provide a response to the request within 40 working days. If the decision is taken not to release the image(s), then they must be held and not destroyed until all legal avenues have been exhausted.

7.4 An evidence log will be maintained of the release of any recordings / images to the police or other authorised applicants.

7.5 The viewing of any recording/image by the Police must be recorded in the evidence log. Requests by the Police can only be actioned under section 29 of the Data Protection Act 1998.

7.6 Should images / recordings be required as evidence, a copy may be released to the Police under the procedures described above and will only be released to the Police on the clear understanding that it remains the property of XXXXX, and that the recording/image and the information contained on it are to be treated in accordance with this policy. XXXXX retains the right to refuse permission for the Police to pass it to any other person. On occasions when a Court requires the release of the original recording / image and not a copy this will be produced from the secure evidence store, complete in its sealed bag.

7.7 The Police may require XXXXX to retain the stored recording/image for possible use as evidence in the future. It must be properly indexed and properly and securely stored until the police needs it.

7.8 Release of Information to third parties only be where it is decided that the publics’ assistance is needed in order to assist in the identification of victim, witness or perpetrator in relation to a criminal incident. The final decision will be taken by the nominated person or their deputy in consultation with the police and will have due regard to the wishes of the victim.

7.9 Recorded images will not be made more widely available and will not be made routinely available to the media. No recorded material will be sold or used for commercial purposes or the provision of entertainment.

7.10 Applications received from outside bodies (e.g. solicitors) to view or release tapes will be referred to the authorised person. In these circumstances the recording / image will normally be released where satisfactory documentary evidence is produced showing that they are required for legal proceedings, a subject access request, or in response to a court order. A fee can be charged in such circumstances: £10 for subject access requests; a sum not exceeding the cost of materials in other cases.

7.11 The location used to view recordings / images will be the main office or authorised person’s Office.

7.12 In normal circumstances images will be deleted and overwritten every 7 days.

**8 Breaches of the Policy (including breaches of security)**

8.1 Any breach of the Policy by staff will be initially investigated by the authorised person, in order for him to take the appropriate disciplinary action. Misuse of CCTV images could be a criminal offence.

8.2 Any serious breach of the policy / commissioner’s Code of Practice will be immediately investigated and an independent investigation carried out to make recommendations on how to remedy the breach.

**9 Complaints**

9.1 Any complaints about XXXXX’s CCTV system should be made to the authorised person in writing.

9.2 Complaints will be investigated in accordance with Section 8 of this Policy.

**10 Access by the Data Subject**

10.1 The Data Protection Act provides data subjects (individuals to whom "personal data" relate) with a right to data held about themselves, including those obtained by CCTV. Requests for Data Subject Access should be made in writing to the Authorised person. A log of requests and how they were dealt with will be maintained. A fee of up to £10.00 can be charged.

**11 Health and Safety**

11.1 XXXXX system will subject to risk assessment in accordance to XXXXX’s Health and Safety policy and procedures around equipment.

**12 Public information**

12.1 Copies of this Policy are available to the public from the Main Office upon request.

12.2 registration details:

Registration Number:

Date Registered:

Registration Expires:

(auto renew every year)

Data Controller: XXXXX

**Address:**

Address of the charity

Note: 1 Authorised persons are: ABC Singh/Kaur & XYZ Singh/Kaur

**Appendix A1**

|  |  |  |  |
| --- | --- | --- | --- |
|  | Checked  (Date) | By | Date of next  Review |
| Notification has been submitted to the Information  Commissioner and the next renewal date recorded. |  |  |  |
| There is a named individual who is responsible for the operation of the system. |  |  |  |
| A system has been chosen which produces clear images, which the law enforcement bodies (usually the police) can use to investigate crime and these can easily be taken from the system when required. |  |  |  |
| Cameras have been sited so that they provide clear images. |  |  |  |
| Cameras have been positioned to avoid capturing the images of persons not visiting the premises. |  |  |  |
| There are visible signs showing that CCTV is in operation. Where it is not obvious who is responsible for the system contact details are displayed on the sign(s). |  |  |  |
| Images from this CCTV system are securely stored, where only a limited number of authorized persons may have access to them. |  |  |  |
| **The recorded images will only be retained long enough for any incident to come to light (e.g. for a theft to be noticed) and the incident to be investigated.** |  |  |  |
| **Except for law enforcement bodies, images will not be provided to third parties.** |  |  |  |
| The organization knows how to respond to individuals making requests for copies of their own images. If unsure the controller knows to seek advice from the Information Commissioner as soon as such a request is made. |  |  |  |
| Regular checks are carried out to ensure that the system is working properly and produces high quality images. |  |  |  |

**Appendix A2**

**Incident Log**

|  |  |  |  |  |  |
| --- | --- | --- | --- | --- | --- |
| **Incident**  **Number** | **Date** | **Time** | **Circumstance** | **Review of recorded information**  **Copy made**  **Name Date Yes / No** | **Copy disc / tape issued**  **Name Date** |
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**Document Reference**

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| Document Signatories | | | |
| Author(s) | Name / Role | Signature(s) | Date |
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| Reviewer(s) | Name/Role | Signature | Date |
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| Approvers(s) | Name / Role | Signature(s) | Date |
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**CONTACT DETAILS**

Name of the Gurdwara / Organisation

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