



# **St Dyfrig's Church CCTV Data Protection Impact Assessment**

The parish of St Dyfrig's Church has installed a Closed-Circuit Television (CCTV) surveillance system. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation. This policy details the purpose, use and management of the CCTV system and the procedures to be followed in order to ensure that the parish of St Dyfrig's Church complies with relevant legislation and Codes of Practice where necessary.

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## Introduction

1. St Dyfrig's Church is one church within the Roman Catholic Archdiocese of Cardiff, registered charity number 1177272. The diocese covers 63 parishes across South Wales and Herefordshire. The Archdiocese owns the Church, Community Hall and Presbytery. All of these buildings are grade II Listed. These buildings and internal grounds have been subject to severe vandalism for a number of years. This hostility has resulted in the Grotto in the church car park, erected at the same time as the church in 1927, being vandalised. The statue of Our Lady (the Virgin Mary) was smashed and decapitated. Photographs were taken of the [damage](#). The [decapitated head of Our Lady](#) was placed on top of the grotto. This was reported to the police (crime number 1500150744) but has not prevented similar attacks on the premises.
2. There have been instances of anti-social behaviour on the parish premises. This tends to occur in the evening. For example, the far-side car park, adjacent to the community hall, had no security lighting. This car park has been used by individuals who gathered for the purpose of taking illicit drugs. There was evidence in the form of drug paraphernalia left behind, such as used syringes and nitrous oxide canisters. In order to deter these attacks and anti-social behaviour an application was made to the Home Office, Places of Worship Protective Security Funding Scheme 2022/23.
3. A survey was undertaken by Esotec Limited who are the appointed partner for the Home Office and they deliver security enhancement to Places of Worship. They attended the premises of St Dyfrig's Church, accompanied by a Design Out of Crime Officer (DOCO) from the local Police force, South Wales Police, to ascertain the security measures that would add the most benefits to the security of the parish of St Dyfrig's Church. The application was successful and based on the recommendations of the DOCO security lighting and CCTV was granted to St Dyfrig's parish.
4. As all the buildings on the parish premises are Grade II listed an application was made to the Catholic Historic Churches Committee prior to the security equipment being installed. [Listed building consent was granted](#) by the Catholic Historic Churches Committee for Wales and Herefordshire and the new external security lighting and CCTV system for the Church, Presbytery and Community Hall has now been installed.
5. The parish of St Dyfrig's Church is using the closed circuit television (CCTV) images for the prevention, identification and reduction of crime. The CCTV security system will monitor the grounds and buildings in order to provide a safe and secure environment for the parish priest, staff, volunteers, parishioners and visitors. It will also prevent the loss of or damage to contents and property.
6. The CCTV system is owned by the parish of St Dyfrig's Church, Broadway, Treforest, Pontypridd CF37 1DB and managed by the parish priest. The parish of St Dyfrig's Church is the system operator, and data controller, for the images produced by the CCTV system, and is registered with the Information Commissioner's Office, [Registration](#) number ZB594797.
7. The CCTV system is operational and is capable of being monitored 24 hours a day. The security lighting is set to come on at dusk and go off at dawn.
8. Estotec Limited as the supplier of the security lighting and CCTV system provide a 12 month equipment warranty from the date of installation. The Grant Manager is Nick Rees.

The Delivery Partner (Installation Contractor) is CDS Integrated Security, Gordon Legg. Further contact details are contained in the [Contractor Pack](#) at page seven.

## Purpose

9. This Policy governs the installation and operation of all CCTV cameras at St Dyfrig's Church, buildings within the parish premises and the internal grounds of the parish.
10. CCTV surveillance is used to monitor and collect visual images for the purposes of:
  - protecting the buildings and assets, both during services, office hours and after hours;
  - promoting the health and safety of staff, parish priest, volunteers, parishioners and visitors;
  - reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
  - supporting the Police in a bid to deter and detect crime;
  - assisting in identifying, apprehending and prosecuting offenders; and
  - ensuring that the rules are respected so that the parish premises can be properly managed.

## Scope

11. This policy applies to premises and internal grounds of the parish of St Dyfrig's Church and controlled by the parish priest who occupies the said premises.
12. Personal data that is deemed a special category and sensitive will be protected and only processed in accordance with [Article 9](#) of the GDPR. This will ensure [section 10](#) of the Equality Act 2010 is reflected in the scope of this policy when dealing with religion or religious beliefs as a protected characteristic.
13. All staff and anyone involved in the operation of the CCTV System will be made aware of this policy and will only be authorised to use the CCTV System in a way that is consistent with the purposes and procedures contained therein.
14. All system users such as staff, volunteers and anyone else with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will have relevant skills and training on the operational, technical and privacy considerations and fully understand the policies and procedures.

## Definitions

**CCTV** – closed circuit television camera. A TV system in which signals are not publicly distributed but are monitored, primarily for surveillance and security purposes and where access to their content is limited by design only to those able to see it.

**Data controller** - the natural or legal person, public authority, agency or other body which, alone or jointly with others, determines the purposes and means of the processing of CCTV images.

**Data Protection Act 2018 (DPA)** - UK data protection framework, regulating the processing of information relating to individuals.

**General Data Protection Regulations 2016 (GDPR)** - European Union data protection framework, regulating the processing of information relating to individuals.

**ICO CCTV Code of Practice 2017 and as [amended in 2021](#)** - recommendations on how the legal requirements of the Data Protection Act 2018 can be met when using CCTV, issued by the Information Commissioner's Office. The guiding principles outlined in the amended Code of Practice 2021 set out how to comply with current legislation.

**Security Industry Authority (SIA)** - the organisation responsible for regulating the private security industry in the UK, under which private use of CCTV is licensed. It is an independent body reporting to the Home Secretary, under the terms of the [Private Security Industry Act 2001](#).

**System Operator** - person or persons that take a decision to deploy a surveillance system, and/or are responsible for defining its purpose, and/or are responsible for the control of the use or the processing of images or other information obtained by virtue of such system.

**System User** - person or persons who may be employed or contracted by the system operator who have access to live or recorded images or other information obtained by virtue of such a system.

## Policy

### Policy statement

15. The parish of St Dyfrig's Church will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
16. The parish of St Dyfrig's Church will comply with the Information Commissioner's Office (ICO) CCTV Code of Practice 2017 (as amended) to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
17. The CCTV system will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.
18. The use of the CCTV system will be conducted in a professional, ethical and legal manner and any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.
19. Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment must be carefully positioned to:
  - cover the specific area to be monitored only;
  - keep privacy intrusion to a minimum;
  - ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage);
  - minimise risk of damage or theft.

### Location and signage

20. Cameras are sited to ensure that they cover the premises as far as is possible. Cameras are installed throughout the parish grounds, including car parks, presbytery and community hall.

- 21. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort is made to position cameras so that their coverage is restricted to the parish of St Dyfrig’s Church, internal grounds and buildings.
- 22. Signs are placed at all pedestrian and vehicle entrances in order to inform parishioners, staff, volunteers, visitors, and any other members of the public who may enter upon the premises. The signage will state that CCTV is in operation.
- 23. The signage indicates that monitoring and recording is taking place, for the purpose of security and operates 24 hours each day. It will provide information on who is the system owner and a contact number.
- 24. Cameras are monitored in a secure private office, located in the presbytery. This allows the parish priest to respond to incidents identified on the CCTV monitor.
- 25. Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that metadata (e.g. time, date and location) is recorded reliably, and compression of data does not reduce its quality.

**Governance of the CCTV system**

- 26. The parish priest will maintain a record of any processing activities that take place in accordance with [Article 30 of the GDPR](#). This will include the date and time of any specific incident recorded by the CCTV recording(s) for the purposes of deterring vandalism or any other anti-social behaviour on the parish premises. This documentation will be stored in a secure place and only used in conjunction with the policy statement of this assessment outlined in paragraphs 15-19
- 27. Any amendments to this documentation will be recorded in the table below.

**Revision history**

Version no.	Revision date	Previous revision date	Summary of changes
01	23/09/2023	N/A	Completion of DPIA by Roland Fletcher