

Data Protection Impact Assessment (DPIA)

Use of Closed-Circuit Television (CCTV), Body-Worn Video (BWV), and Daily Broadcasts / Live Streaming

Organisation: Bhaktivedanta Manor, Dharam Marg, Watford, UK

Date: April 2026

Assessment type: Ongoing and enhanced use of CCTV, deployment of Body-Worn Video (BWV), and Daily Broadcasts / Live Streaming of services and festivals

Legal framework: UK GDPR, Data Protection Act 2018, Human Rights Act 1998, Surveillance Camera Code of Practice

1. Data Controller Details

Data controller: ISKCON Bhaktivedanta Manor

Address: Bhaktivedanta Manor, Dharam Marg, Aldenham, Hertfordshire, WD25 8EZ

Data-protection lead: Yogendra Sahu

Contact for data-protection matters: dpo@krishnatemple.com

2. Description of the Processing

Bhaktivedanta Manor operates three interconnected visual and audio processing systems across the site:

- **Fixed CCTV System:** Operates continuously across site public areas capturing visual images for safety and security. Audio recording is not used on fixed CCTV.
- **Body-Worn Video (BWV):** Mobile devices deployed by trained security and stewarding personnel during high-risk scenarios, crowd management, or active security incidents. BWV devices capture visual images and audio (voice recording) on an incident-led, targeted basis.
- **Daily Broadcasts and Live Streaming:** Fixed and operator-controlled broadcast cameras installed within the primary temple hall and festival stages to stream daily services, lectures, ceremonies, and major festivals online (e.g., website, YouTube, social media platforms). Broadcasts primarily target the altar, deities, priests, and main stage performers.

3. Purpose and Justification

The purposes of processing are multi-faceted:

- **CCTV & BWV:** Ensure the safety of worshippers, visitors, volunteers, and staff; deter and detect crime or disorder; manage large crowds during public festivals; protect staff from abuse; and provide reliable evidential material in investigations.
- **Broadcasts & Live Streaming:** Enable remote worship and spiritual engagement for housebound devotees, international congregation members, and the wider public who cannot attend in person, particularly during major religious festivals and daily temple ceremonies.

Given high visitor volumes, fixed CCTV and targeted BWV provide necessary security. Live streaming serves core religious and community outreach objectives, configured with strict framing protocols to respect individual privacy rights.

4. Location and Context of Use

CCTV cameras operate in public/semi-public site areas (entrances, exits, circulation routes, car parks). CCTV is not positioned in private spaces, restrooms, or private prayer/counselling areas. BWV devices are mobile and used dynamically across the site, strictly prohibited in private areas unless responding to an immediate, severe security/safety threat.

Broadcast and Live Streaming cameras are situated in the main Temple Room and main festival stage areas. Framing is strictly directed towards the altar/stage. Designated "Camera-Free / Non-Broadcast Zones" are established within the worship hall to ensure attendees can participate without appearing on public live streams.

5. Individuals Affected

Individuals affected include worshippers and devotees, online viewers/subscribers, members of the public, children and families, school groups, volunteers, staff, and contractors.

6. Lawful Basis for Processing

Article 6(1)(f) UK GDPR – Legitimate Interests: For CCTV and BWV, legitimate interests include protection of people and property, safety, crime prevention, and staff protection.

Article 6(1)(a) UK GDPR – Consent / Article 6(1)(f) Legitimate Interests: For live streaming and broadcasts, processing is based on legitimate religious outreach interests, supplemented by explicit transparency, designated camera-free zones, and consent mechanisms where individuals are featured prominently in close-ups.

Special-Category Considerations (Article 9 UK GDPR): Image/audio capture during religious

worship directly or incidentally reveals religious belief (special category data). Processing under Article 9(2)(d) applies for internal/congregational religious activities, and Article 9(2)(a) (explicit consent) or robust technical safeguards (tight camera framing, non-streamed seating areas) are enforced for public broadcasts to protect attendee privacy.

7. Transparency Measures

Clear signage is displayed at the site entrances, inside the main temple room, and at festival zones explaining CCTV, BWV, and Live Streaming operations.

- **BWV Transparency:** Personnel display visible BWV badges and give explicit verbal warnings before activation ("I am now activating my body-worn camera, which records video and audio").
- **Broadcast Transparency:** On-site physical signs clearly mark "Broadcast Area" and guide individuals to "Camera-Free Seating Zones." Online stream descriptions contain privacy notices informing viewers of streaming policies.

8. Operation and Safeguards

Fixed CCTV: Operates overtly with fixed framing, avoiding unnecessary close-ups or tracking beyond operational need.

Body-Worn Video (BWV): Operates on an incident-driven basis, manually triggered only when necessary (e.g., escalating conflict or security threats). Continuous recording is strictly prohibited.

Live Streaming & Broadcasts: Cameras are framed tightly on the altar, officiants, musicians, and stage. Panning across general audience seating is prohibited during regular broadcasts. School visits, children, and private counselling/blessings are strictly excluded from public streams.

9. Storage, Access, and Retention

CCTV and BWV footage are stored on encrypted servers with restricted access and audit logging. Standard retention is 30 days unless needed for legal, security, or police investigations. Live streams broadcast online are archived on official platforms (e.g., YouTube/social media) under strict administrative controls. Archived videos undergo periodic review, and any individual requesting removal/timestamp redaction of their image can exercise their rights under UK GDPR.

10. Rights and Complaints

Individuals may exercise their rights under UK GDPR, including subject access requests, requests for erasure, or objections to being streamed. Requests are processed within statutory timescales. For live streams, requests to blur, edit out, or remove archived segments containing

identified individuals are handled promptly. Redaction and audio masking are applied to protect third parties.

11. Training and Governance

Access to CCTV, BWV systems, and broadcast equipment controls is limited to authorised security, media, and data protection personnel. Staff and volunteers managing live streams receive training on privacy limits, camera framing, and safeguarding. Security personnel equipped with BWV receive de-escalation and privacy training. The system and DPIA are reviewed annually.

12. Outcome and Review

This DPIA concludes that the combined use of CCTV, targeted Body-Worn Video, and Daily Broadcasts/Live Streaming at Bhaktivedanta Manor is necessary, proportionate, and subject to adequate safeguards to protect individual privacy and special category data rights. The DPIA will be reviewed annually or following any major changes to streaming technologies or site surveillance operations.