

St Martins with St Peters Parochial Church Council CCTV policy

Policy summary

St Martins with St Peters Parochial Church Council (PCC) has in place a Closed-Circuit Television (CCTV) surveillance system. This policy details the purpose, use and management of the CCTV system and details the procedures to be followed in order to ensure that St Martins with St Peters PCC complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures therein detailed, applies to all of St Martins with St Peters PCC CCTV systems that capture images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded in strict accordance with this policy.

Contents

Page

Policy summary.....	1
Introduction.....	3
Purpose.....	3
Scope.....	3
Policy	4
Policy statement.....	4
Location and signage.....	4
Monitoring and recording.....	5
Covert surveillance.....	5
Live Streaming	6
Data Protection	6
Retention of images	7
Complaints Procedure	7
Review Procedure	7
Responsibilities	8
Definitions	8
Approval and review.....	9
Revision history.....	9

Introduction

1. St Martins with St Peters PCC uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor St Martins with St Peters PCC buildings in order to provide a safe and secure environment for staff, clergy, Church Officers, volunteers, visitors, hirers and users and to prevent the loss of or damage to St Martins with St Peters PCC contents and property both internally and externally.
2. The CCTV system is owned by St Martins with St Peters PCC, London Road, Worcester, WR5 2ED and managed by the Incumbent and Churchwarden of St Martins with St Peters PCC. St Martins with St Peters PCC 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 ZA441657.
3. The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

Purpose

4. This Policy governs the installation and operation of all CCTV cameras at St Martins with St Peters Church.
5. CCTV surveillance is used to monitor and collect visual images for the purposes of:
 - protecting the buildings and assets, both during services or office hours, and after hours;
 - protecting the buildings and assets when the Church is used by external hirers and those with permission to use the premises for other agreed non – payment events
 - promoting the health and safety of staff, clergy, Church Officers, volunteers, visitors, hirers and other users;
 - reducing the incidence of crime and anti-social behaviour (including theft, vandalism and misuse of illegal substances);
 - 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 site can be properly managed.

Scope

6. This policy applies to St Martins with St Peters PCC.
7. This policy is applicable to, and must be followed by, all staff, clergy, Church Officers, trustees, committee members, volunteers, visitors, hirers, users, consultants and contractors. Failure to comply could result in disciplinary action, including dismissal and cessation of hiring agreements and engagement of consultants or contractors..
8. All those involved in the operation and monitoring of the CCTV System and recordings will be given a copy of this policy and any subsequent amendments or revisions. A copy will be made available on St Martins with St Peters website and its existence along with information on who is authorised to access the CCTV system and how this will only be consistent with the purposes and procedures contained therein.
9. All systems users 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.

10. Where required, CCTV operators will be properly licensed by the Security Industry Authority as follows:
 - The Churchwarden will be the person responsible for overseeing the CCTV and as this is a volunteer role a license is not needed. If at any point this changes then a review of the need for a license must be considered.

Policy

Policy statement

11. St Martins with St Peters PCC will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
12. St Martins with St Peters PCC complies with Information Commissioner's Office (ICO) CCTV Code of Practice 2013 to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
13. 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.
14. 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.
15. 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.
16. CCTV will **not** be used for the purposes of streaming live services held in the church or grounds.
17. Interior CCTV will not record areas set aside for private devotions where one would not expect to be filmed while praying. Similarly, where sacramental Confession or other ministries of individual pastoral support, such as healing, are practised, there will be no filming in the part or parts of the church set aside for such purposes. Interior cameras will not be able to view any form of service, whether regular worship or occasional offices. The CCTV system does not have the capacity to record sound.
18. Exterior CCTV, or cameras in areas that are not used for public worship will remain in operation during services.

Location and signage

19. Cameras are sited to ensure that they cover the premises as far as is possible. Cameras are installed internally and externally including vehicular and pedestrian access points to the Church grounds, car parks, and 3 entrances to the Church including both upper and lower levels. These include externally, in vulnerable public facing areas.

20. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements. Every effort has been made to position cameras so that their coverage is restricted to St Martins with St Peters PCC premises, which includes outdoor areas.
21. Signs are placed at all pedestrian and vehicular entrances in order to inform all entering the premises and grounds that CCTV is in operation.
22. The signage is sited on St Martins with St Peters PCC grounds and premises so it is obvious to all where complaints/questions about the systems should be directed.

Monitoring and recording

23. Cameras are monitored in a secure office, and also the Churchwarden is able to view live streaming and recordings remotely in order to be able to respond to incidents and/or concerns about the premises. The system is not linked to the police or an alarm or security company.
24. Images are recorded on the systems hard drive and remotely as identified above and are viewable by the Incumbent, Churchwarden and Team Administrator.
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.
26. A viewing monitor is located in the office and access to recordings is password protected.
27. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed and all cameras are checked daily to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
28. All images recorded by the CCTV System remain the property and copyright of St Martins with St Peters PCC

Covert surveillance

29. The use of covert cameras will be restricted to rare occasions, when a series of criminal acts have thought to have taken place within a particular area that is not otherwise fitted with CCTV. A request for the use of covert cameras will clearly state the purpose and reasons for use and the authority of St Martins with St Peters PCC, followed by a Diocesan request will be sought before the installation of any covert cameras. St Martins with St Peters PCC should be satisfied that all other physical methods of prevention have been exhausted prior to the use of covert recording.
30. Covert recording will only take place if informing the individual(s) concerned would seriously prejudice the reason for making the recording and where there are reasonable grounds to suspect that illegal or unauthorised activity is taking place. All such monitoring will be fully documented and will only take place for a limited and reasonable period.
31. Where covert surveillance is authorised, its use must cease as soon as any active investigation has concluded.

Live Streaming

32. CCTV is not suitable for live streaming of services, as it is intended solely for safety and security purposes.

Data Protection

33. In its administration of its CCTV system, St Martins with St Peters PCC complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and in accordance with St Martins with St Peters PCC Data Protection Policy.

Data Protection Impact Assessments

34. The CCTV system is subject to a Data Protection Impact Assessment. 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 will include consultation with relevant internal and external stakeholders.

Applications for disclosure of images

35. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Team Administrator together with proof of identification.
36. In order to locate the images on the system sufficient detail must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
37. Where St Martins with St Peters PCC is unable to comply with a Subject Access Request without disclosing the personal data of another individual who is identified or identifiable from that information, it is not obliged to comply with the request unless satisfied that the individual has provided their express consent to the disclosure, or if it is reasonable, having regard to the circumstances, to comply without the consent of the individual.
38. A request for images made by a third party should be made to the Incumbent or Churchwarden.
39. In limited circumstances it may be appropriate to disclose images to a third party, such as when a disclosure is required by law, in relation to the prevention or detection of crime or in other circumstances where an exemption applies under relevant legislation.
40. Such disclosures will be made at the discretion of the incumbent or Churchwarden, with reference to relevant legislation and where necessary, following advice from the Diocesan legal department if necessary.
41. Where a suspicion of misconduct arises and at the formal request of the Investigating Officer the Incumbent or Churchwarden may provide access to CCTV images for use in disciplinary cases.
42. A log of any disclosure made under this policy will be held by the Incumbent or Churchwarden itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.

43. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
44. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
45. Images may be released to the media for purposes of identification. Any such decision to disclose will be taken in conjunction with the Police and/or other relevant law enforcement agencies.
46. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of images

47. Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 31 calendar days from the date of recording. Images will be automatically overwritten or destroyed after this time.
48. Where an image is required to be held in excess of the retention period St Martins with St Peters Leadership Team will be responsible for authorising such a request, and recordings will be protected against loss or held separately from the surveillance system and will be retained for 6 months following date of last action and then disposed of as per above
49. Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidentiary purposes will be deleted.
50. Access to retained CCTV images is restricted to the Incumbent and Churchwarden and other persons as required and as authorised by St Martins with St Peters Leadership Team.

Complaints Procedure

51. Complaints concerning St Martins with St Peters PCC use of its CCTV system or the disclosure of CCTV images should be made to the Team Administrator initially, and will then be considered by the St Martins with St Peters Leadership Team.
52. When requested, anonymised information concerning complaints will be provided to the Surveillance Commissioner.

Review Procedure

53. There will be a review of the use of the CCTV system to ensure it remains necessary, proportionate and effective in meeting the stated purposes. This review will be at least every three years.
54. As part of the review of St Martins with St Peters PCC will assess:
 - whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation;
 - the monitoring operation, e.g. if 24 hour monitoring in all camera locations is necessary or whether there is a case for reducing monitoring hours;
 - whether there are alternative and less intrusive methods for achieve the stated purposes.

Responsibilities

55. St Martins with St Peters PCC is responsible for the overall management and operation of the CCTV system, including activities relating to installations, recording, reviewing, monitoring and ensuring compliance with this policy.
56. St Martins with St Peters PCC is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
57. St Martins with St Peters Incumbent or Churchwarden is responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.

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.

ICO CCTV Code of Practice 2017 - recommendations on how the legal requirements of the Data Protection Act 1998 can be met when using CCTV, issued by the Information Commissioner's Office. The guidance will be updated 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](#).

Surveillance Camera Code of Practice 2013 - statutory guidance on the appropriate and effective use of surveillance camera systems issued by the Government in accordance with Section 30 (1) (a) of the Protection of Freedoms Act 2012.

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.

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

Approval and review

Approved by	St Martins with St Peters PCC
Policy owner	Incumbent and Churchwarden
Policy author	Churchwarden using CofE template
Date	1.3.26
Review date	1.3.29

Revision history

Policy introduced 1.4.26 V1

Version no.	Revision date	Previous revision date	Summary of changes
Version 1	1.4.27	N/A	