ST MARY STOKE

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CCTV POLICY

St Mary Stoke PCC

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

This policy, and the procedures detailed within it, applies to all of St Mary Stoke PCC's CCTV systems, including covert installations capturing 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.

1. Introduction

1.1 St Mary Stoke PCC uses CCTV images for the prevention, identification and reduction of crime, and to monitor St Mary Stoke PCC buildings in order to provide a safe and secure environment for staff, clergy, church officers, volunteers and visitors, and to prevent the loss of or damage to St Mary Stoke PCC contents and property.

1.2 The CCTV system is owned by St Mary Stoke PCC, Stoke Street, Ipswich, IP2 8BX, and managed by St Mary Stoke PCC and/or its appointed agents. St Mary Stoke PCC is the system operator and data controller for the images produced by the CCTV system.

1.3 The CCTV system is operational and capable of being monitored 24 hours a day, every day of the year.

2. Purpose

2.1 This policy governs the installation and operation of all CCTV cameras at St Mary Stoke Church.

2.2 CCTV surveillance is used to monitor and collect visual images for the purposes of:

- protecting the buildings and assets, both during services (externally) or office hours, and after hours;
- promoting the health and safety of staff, volunteers 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 site(s) can be properly managed.

3. Scope

3.1 This policy applies to St Mary Stoke PCC, and also to any separate legal entities owned and controlled by it which occupy premises controlled by the CCTV system.

3.2 Where a system is jointly owned or jointly operated, the governance and accountability arrangements are agreed between the partners and documented, so that each partner organisation has clear responsibilities, with clarity over obligations, expectations and procedures for the resolution of any differences.

3.3 This policy is applicable to, and must be followed by, all staff, including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to volunteers, trustees, committee members and Synod members.

3.4 All staff and church officers involved in the operation of the CCTV system will be made aware of this policy and will only be authorised to use it in a way that is consistent with the purposes and procedures contained within it.

3.5 All system users – staff, volunteers and church officers 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 will fully understand the policies and procedures.

3.6 Where required, CCTV operators will be properly licensed by the Security Industry Authority (SIA), as follows:

- A licence is required for cathedrals and churches where CCTV is used for wider security purposes and the system is staffed by paid security staff.
- A minister who is listed as the CCTV operator, as a fixed entity/person, will be treated as an "employee" and will therefore require a licence.
- A licence is not needed if the person overseeing the CCTV is undertaking the work as a volunteer and receives no payment in kind or reward for services. If the person in charge is a churchwarden, a licence may not be needed. The PCC should consider who is best placed to hold the licence (churchwarden or minister) to reduce disruption when personnel change.

4. 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.
- Covert surveillance – observation and/or recording carried out without the subject's knowledge, which may be done using cameras or devices that are not visible to the subject.
- 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) – the UK data protection framework, regulating the processing of information relating to individuals.
- Facial/automated recognition – the use of camera technology to identify individuals' faces and to make automated matches.
- UK GDPR – UK General Data Protection Regulation.
- 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 – statutory guidance on the appropriate and effective use of surveillance camera systems, issued by the Government under Section 30(1)(a) of the Protection of Freedoms Act 2012.
- System operator – the person or persons who 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 a system.
- System user – the person or persons who may be employed or contracted by the system operator and who have access to live or recorded images or other information obtained by virtue of such a system.

5. Policy Statement

5.1 St Mary Stoke PCC will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

5.2 St Mary Stoke PCC complies with the Information Commissioner's Office (ICO) CCTV Code of Practice, to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.

5.3 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.

5.4 The use of the CCTV system will be conducted in a professional, ethical and legal manner. Any diversion of the use of CCTV security technologies for other purposes is prohibited by this policy.

5.5 Cameras will be sited so they only capture images relevant to the purposes for which they are installed. 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.

5.6 CCTV will not be used for the purposes of streaming live services held at St Mary Stoke.

5.7 Interior CCTV will not record areas set aside for private devotions where one would not expect to be filmed while praying. Similarly, in any part of the church used for sacramental confession or other ministries of individual pastoral support, such as healing, there should be no filming in the area(s) set aside for such purposes. Interior cameras will not be in use during any form of service, whether regular worship or occasional offices.

5.8 Exterior CCTV, or cameras in areas not used for public worship, will remain in operation during services.

6. Location and Signage

6.1 Cameras are sited to ensure that they cover the premises as far as possible, and are installed throughout the site.

6.2 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 St Mary Stoke PCC premises, which may include outdoor areas.

6.3 Signs are placed at all pedestrian and vehicular entrances, to inform staff, church officers, visitors and members of the public that CCTV is in operation.

6.4 The signage indicates that monitoring and recording is taking place, for what purposes, the hours of operation, who the system owner is, and where complaints/questions about the system should be directed.

6.5 Signage templates are included in Appendix 1.

7. Monitoring and Recording

7.1 Cameras are monitored in a secure private office.

7.2 For churches where CCTV is added for security purposes, a fixed and secure lockbox/cabinet may be used for monitoring and viewing CCTV images, with data accessed via a wireless device. The box may be hidden in an open space, with data broadcast over a private server and made available via a live stream to the operator.

7.3 Images are recorded on secure servers and are viewable by staff members. Additional staff may be authorised to monitor cameras sited within their own areas of responsibility, on a view-only basis.

7.4 Where cloud-based storage is used, we will ensure that such storage is located in the UK or European Economic Area (EEA), and that all relevant security and data protection measures are in place.

7.5 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 that compression of data does not reduce its quality.

7.6 Viewing monitors should be password protected and switched off when not in use, to prevent unauthorised use or viewing.

7.7 The cameras installed provide images of suitable quality for the purposes for which they are installed. All cameras are checked daily to ensure that images remain fit for purpose and that the date and time stamp recorded is accurate.

7.8 All images recorded by the CCTV system remain the property and copyright of St Mary Stoke PCC.

8. Covert Surveillance

8.1 Covert surveillance is the use of hidden cameras or equipment to observe and/or record the activities of a subject, carried out without their knowledge.

8.2 St Mary Stoke PCC will not engage in covert surveillance.

9. Live Streaming

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

10. Data Protection

10.1 In its administration of its CCTV system, St Mary Stoke PCC complies with the UK GDPR and the Data Protection Act 2018, and in accordance with the St Mary Stoke PCC Data Protection Policy.

Data Protection Impact Assessments

10.2 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, including consultation with relevant internal and external stakeholders.

Applications for Disclosure of Images

10.3 Requests by individual data subjects for images relating to themselves, via a Subject Access Request, should be submitted to stmarystoke@gmail.com, together with proof of identification.

10.4 In order to locate the images on the system, sufficient detail must be provided by the data subject to allow the relevant images to be located and the data subject to be identified.

10.5 A copy of the footage must be given to anyone whose data it contains, unless an exemption applies. If they agree, arrangements can be made for them to view the footage rather than receive a copy. If the footage includes other people, it will need to be redacted (e.g. edited or blurred) so they cannot be identified, considering the level of harm to those people if not redacted. Where redaction is not possible, consent should be sought before releasing the footage; where this is not possible or appropriate, the requester's rights must be balanced against any third-party rights to privacy, and a decision made as to whether it is reasonable to share the footage without consent. The reasons for the decision should be documented.

10.6 A request for images made by a third party should be made to stmarystoke@gmail.com.

10.7 In limited circumstances it may be appropriate to disclose images to a third party – such as where 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.

10.8 Such disclosures will be made at the discretion of St Mary Stoke PCC, with reference to relevant legislation.

10.9 Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.

10.10 Where information is disclosed, the disclosing officer must ensure it is transferred securely.

10.11 Images may be released to the media for purposes of identification. Any such decision will be taken in conjunction with the Police and/or other relevant law enforcement agencies.

10.12 Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

11. Retention of Images

11.1 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.

11.2 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.

11.3 Access to retained CCTV images is restricted to staff and other persons as required and as authorised by St Mary Stoke PCC.

12. Complaints Procedure

12.1 Complaints concerning the organisation's use of its CCTV system, or the disclosure of CCTV images, should be made to stmarystoke@gmail.com.

13. Review Procedure

13.1 There will be an annual review of the use of the CCTV system, to ensure it remains necessary, proportionate and effective in meeting the stated purposes.

13.2 As part of the review, St Mary Stoke 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. whether 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 to achieve the stated purposes.

14. Responsibilities

14.1 St Mary Stoke PCC is responsible for the overall management and operation of the CCTV system, including activities relating to installation, recording, reviewing, monitoring and ensuring compliance with this policy.

14.2 St Mary Stoke PCC is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

14.3 St Mary Stoke PCC is responsible for authorising the disclosure of images to data subjects and third parties, and for maintaining the disclosure log.

Approval and Review

Approved by	
Policy owner	
Date	
Review date	

Appendix 1 – CCTV Signage

Signage should state that CCTV is in operation, the purpose of the system, the hours of operation, the identity of the system owner (St Mary Stoke PCC), and contact details for queries or complaints (stmarystoke@gmail.com).

Adapted from the Church of England CCTV Policy template, for St Mary Stoke PCC.