



St. Michael & All Angels

CHURCH IN THE PARK | LIVING, LOVING, SERVING

The Parish of St Michael and All Angels, Hughenden

CCTV Policy

The following policy was agreed at the Parochial Church Council (PCC) meeting held on 26th May 2022.

Summary

1. The church of St Michael and All Angels, Hughenden 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 the church complies with relevant legislation and Codes of Practice.
2. This policy and the procedures therein detailed apply to all of the church's CCTV systems. CCTV images are monitored and recorded in strict accordance with this policy.

Introduction

3. The church uses CCTV images for the prevention, identification and reduction of crime and to monitor the church buildings in order to provide a safe and secure environment for workers, congregation, visitors and others who may use the church, and to prevent the loss of or damage to church contents and property.
4. The CCTV system is owned by the PCC. The 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 ZB294781. The system is operational and is capable of being monitored for 24 hours a day, every day of the year.

Purpose

5. This policy governs the installation and operation of all CCTV cameras at the church. CCTV surveillance is used to monitor and collect visual images for the purposes of:
 - a. protecting the buildings and assets.
 - b. promoting the health and safety of staff, volunteers, and visitors.
 - c. reducing the incidence of crime and anti-social behaviour (including theft and vandalism).
 - d. supporting the Police in a bid to deter and detect crime.
 - e. assisting in identifying, apprehending and prosecuting offenders.

Scope

6. This policy is applicable to everyone involved in the operation of the CCTV system. They will be made aware of this policy and will only be authorised to use the system in a way that is consistent with the purposes and procedures contained therein.

7. 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.

Policy statement

8. The church will operate its CCTV system in a manner that is consistent with respect for the individual's privacy with its CCTV policies based on guidance from the Church of England. The church complies with the Information Commissioner's Office (ICO) CCTV Code of Practice 2017 to ensure CCTV is used responsibly and safeguards confidence in its continued use.

9. The CCTV system will be used to observe the areas under surveillance to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed. 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.

10. 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:

- a. cover the specific area to be monitored only;
- b. keep privacy intrusion to a minimum;
- c. ensure that recordings are fit for purpose and not in any way obstructed (e.g. by foliage);
- d. minimise risk of damage or theft.

11. CCTV will not be used for the purposes of streaming live services held in the church. CCTV is not suitable for live streaming of services, as it is intended solely for safety and security purposes.

12. 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 in use during any form of service, whether regular worship or occasional offices. Exterior CCTV, or cameras in areas that are not used for public worship, will remain in operation during services.

Location and signage

13. Cameras are sited to ensure that they cover the premises as far as possible, installed throughout the site including the entrances. 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 church's premises, which may include outdoor areas.

14. Signs are placed at all entrances to inform staff, church officers, visitors and members of the public that CCTV is in operation. Signage templates are at Appendix 1.

Monitoring and recording

15. Images are recorded on a device installed in a locked office. They are viewable by church officers, church wardens, the data protection officer and the system's technical support adviser. 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. All images recorded remain the property and copyright of the church.

16. Viewing monitors are password protected and switched off when not in use to prevent unauthorised use or viewing. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed.

Data protection

17. In its administration of its CCTV system, the church complies with the Data Protection Act 2018 and in accordance with the church's Data Protection Policy. The writing of this policy fulfilled the requirement of a Data Protection Impact Assessment, which mitigated any risks related to the installation and ensured full compliance with data protection legislation.

Applications for disclosure of images

18. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Data Protection Officer together with proof of identification. 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.

19. Where the church is unable to comply with a Subject Access Request without disclosing the personal data of another individual (or individuals) 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.

20. A request for images made by a third party should also be made to the Data Protection Officer. 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. Such disclosures will be made at the discretion of the PCC, with reference to relevant legislation and where necessary, following advice from a legal advisor.

21. A log of any disclosure made under this policy will be held by the Data Protection Officer itemising the date, time, camera, requestor, reason for the disclosure, lawful basis for disclosure, date of decision and/or release, and name of the authoriser.

22. Before disclosing any footage, consideration should be given to the potential impact to any third parties whose images are captured. Where information is disclosed, the disclosing officer must ensure information is transferred securely. 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.

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

Retention of images

24. 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.

25. Where an image is required to be held in excess of the retention period, the Incumbent 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 the date of last action and then disposed of as above.

26. 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. Access to retained CCTV images is restricted to those people listed in paragraph 15.

Complaints

27. Complaints concerning the church's use of its CCTV system or the disclosure of CCTV images should be made by following the general complaints procedure available on the church's website: <https://hughendenparishchurch.org.uk/Policies>

Review

28. There will be a regular review of the use of the CCTV system and this policy to ensure it remains necessary, proportionate and effective in meeting the stated purposes. As part of the review, the church will assess:

- a. whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation;
- b. the monitoring operation, e.g. if 24 monitoring in all camera locations is necessary or whether there is a case for reducing monitoring hours;
- c. whether there are alternative and less intrusive methods for achieving the stated purposes.

Responsibilities

29. The 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. The PCC is also responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

30. The Data Protection Officer is responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.