

St John's Church Keynsham CCTV policy for Church and Parish Hall

Policy summary

St John's Church, the adjacent Parish Hall and One Community Trust Building have a unified 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 John's Church complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures therein detailed, applies to all of St John's Church, the adjacent Parish Hall and One Community Trust building, CCTV systems 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.

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Introduction

1. St John's Church uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor St John's Church 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 John's Church contents and property.

The CCTV system is owned by St John's Church, 1, The Park, Keynsham, Bristol BS31 2BL and managed by St John's Church District Church Council (DCC). St John's Church is the system operator, and the data controller for GDPR is the Parish of Keynsham, for the images produced by the CCTV system and is registered with the Information Commissioner's Office, Registration number Z7119028

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

Purpose

3. This Policy governs the installation and operation of all CCTV cameras at St John's Church.
4. 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.
 - ensuring that the rules are respected so that the site can be effectively managed.

Scope

5. This policy applies to St John's Church.
6. This policy is applicable to, everyone and failure to follow the policy is a serious matter.
7. 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 the CCTV System in a way that is consistent with the purposes and procedures contained therein.
8. The Facilities Manager and the St John's site caretaker have 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.
9. Where required, CCTV operators will be properly licensed by the Security Industry Authority as follows:
 - A license 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 license.
- A license is not needed if the person overseeing the CCTV is undertaking the work as a volunteer and receives no payment in kind or a reward for services. [If the person in charge of this is a Churchwarden, a license may not be needed. The PCC should consider who is best placed to hold the license (churchwarden or minister) to reduce disruption with changing personnel.]

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 (DPA)

DPA 2018 has already enacted the EU GDPR’s requirements into UK law, and with effect from 1 January 2021, the DPPEC (Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit)) Regulations 2019 amended the DPA 2018 and merged it with the requirements of the EU GDPR to form a new, UK specific data protection regime that works in a UK context after Brexit as part of the DPA 2018. This new regime is known as ‘the UK GDPR’

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. This is St John’s DCC

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. This is the Facilities Manager and the St John’s site caretaker.

Policy

Policy statement

10. St John’s Church will operate its CCTV system in a manner that is consistent with respect for the individual’s privacy.

11. St John's Church complies with Information Commissioner's Office (ICO) CCTV Code of Practice 2017 to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.
12. 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.
13. 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.
14. 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.
15. CCTV will **not** be used for the purposes of streaming live services held in the St John's Church. CCTV cameras within St John's Church will remain on and recording during public services.
16. Exterior CCTV, or cameras in areas that are not used for public worship will remain in operation during services.

Location and signage

17. Cameras are sited to ensure that they cover the premises as far as is possible. Cameras are installed throughout the site including the car parks, The interior and exterior of St John's church, the Parish Hall and the One Community Trust building.
18. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements.
19. Signs are placed at all pedestrian and vehicular entrances in order to inform staff, church officers, visitors and members of the public that CCTV is in operation.
20. 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 systems should be directed.
21. The sign is included in Appendix 1.

Monitoring and recording

22. The recording equipment is stored within a secure office, the system can also be accessed via an app
23. For churches where CCTV is added for security purposes, a fixed and secure lockbox/cabinet is used for monitoring and viewing CCTV images, and the data will be accessed via a wireless device. The box may be hidden in an open space, and the data broadcasted over a private server and made available via a live stream to the user.

24. Images are recorded on secure servers and are viewable by the Facilities Manager and the St John's site caretaker. Additional staff may be authorised by the DCC to monitor cameras sited within their own areas of responsibility on a view only basis.
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. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.
27. All images recorded by the CCTV System remain the property and copyright of St John's Church

Live Streaming

38. CCTV is located within the church but will not be used live streaming of services, as it is intended solely for safety and security purposes.

Data Protection

39. In its administration of its CCTV system, St John's Church complies with the UK General Data Protection Regulation (GDPR) and the Data Protection, Privacy and Electronic Communications (Amendments etc) (EU Exit) Regulations 2019 and in accordance with the Privacy Notice

<https://static1.squarespace.com/static/5cf5723130ef0f000136e25c/t/5ebc0cbbfd319905a3570ecc/1589382331469/Privacy+Notice+Final.pdf>

Data Protection Impact Assessments

40. The CCTV system is subject to a Data Protection Impact Assessment which identifies . 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

41. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Parish Office together with proof of identification.
42. 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.
43. Where St John's Church 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.

44. A request for images made by a third party should be made to The Parish Office, 1 The Park, Keynsham, Bristol BS31 2BL
45. 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.
46. Such disclosures will be made at the discretion of the church officers with reference to relevant legislation and where necessary, following advice from the Diocesan Legal Team
47. A log of any disclosure made under this policy will be held by the St John's DCC itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
48. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
49. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
50. 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.
51. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of images

52. 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.
53. Where an image is required to be held in excess of the retention period the Facilities Manager and the St John's site caretaker, in consultation with the Team Rector, 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.
54. 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.
55. Access to retained CCTV images is restricted to the following - the Facilities Manager, the Office Manager, the St John's site caretaker, parish clergy and other persons as required and as authorised by St John's Church DCC.

Complaints Procedure

56. Complaints concerning the St John's use of its CCTV system or the disclosure of CCTV images should be made to the Parish Office, 1 The Park, Keynsham, Bristol BS31 2BL
57. When requested, anonymised information concerning complaints will be provided to the Surveillance Commissioner.

Review Procedure

58. 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.
59. As part of the review of the St John's Church system we 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 hours 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

60. The St John's DCC 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.
61. The Churchwarden is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
62. The Data Protection Officer 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	St John's District Church Council
Policy author	Based Church of England template authored by M McAllister, Data Protection Officer, National Church Institutions
Date	21/9/20
Review date	

Revision history

Version no.	Revision date	Previous revision date	Summary of changes
0.1	2/4/21		Draft CoE CCTV Policy Template
0.2	10/6/2021		St Francis policy updated to that of St John's



**Images are being recorded 24 hours a day
for the purpose of public safety, crime
prevention, detection and prosecution of
offenders.**

The scheme is controlled by

St John's Church

For information contact Parish Office

0117 9863354