



CCTV Policy

All Saints' Church, Walsoken

Please refer to Document S&S_Doc_001 for all Safeguarding and Social requirements.

Specific Policy

This Safeguarding & Social (S&S) sub-policy controls CCTV use at church.

Policy Summary

All Saints' Church, Walsoken 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 to ensure that All Saints' Church, Walsoken complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures detailed, applies to all All Saints' Church, Walsoken CCTV systems including any covert installations capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are recorded in strict accordance with this policy.

Introduction

- 1) All Saints' Church, Walsoken uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the All Saints' Church, Walsoken buildings to provide a safe and secure environment for clergy, church officers, volunteers and visitors, and to prevent the loss of or damage to All Saints' Church, Walsoken's contents and property.
- 2) The CCTV system is owned by the All Saints' Church, Walsoken and managed by All Saints' Church, Walsoken. All Saints' Church, Walsoken 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 ZA001312
- 3) The CCTV system is operational and is capable of being monitored for 24 hours a day, every day of the year.

Purpose

- 1) This Policy governs the installation and operation of all CCTV cameras at All Saints' Church, Walsoken.
- 2) CCTV surveillance is used to monitor and collect visual images for the purposes of.
 - a. Protecting the buildings and assets, both during services, when the church is open and closed.
 - b. Promoting the health and safety of clergy, 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.
 - f. Ensuring that the rules are respected so that the site/s can be properly managed.

Scope

- 1) This policy applies only to All Saints' Church, Walsoken.
- 2) The system is solely owned by All Saints' Church, Walsoken.
- 3) This policy is applicable to, and must be followed by, all officers of All Saints' Church, Walsoken. Failure to comply could result in legal proceedings.
- 4) All 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.
- 5) All 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 fully understand the policies and procedures.
- 6) All Saints' Church, Walsoken does not need to be licenced by Security Industry Authority because:
 - a. CCTV is not used for wider security purposes, and the system is not staffed by paid security staff:
 - b. A minister is not listed as the CCTV operator.
 - c. The person overseeing the CCTV is undertaking the work as a volunteer and receives no payment in kind or a reward for services.

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Policy Statement

- 1) All Saints' Church, Walsoken will operate its CCTV system in a manner that is consistent with respect for all individual's privacy.
- 2) All Saints' Church, Walsoken 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.
- 3) 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.
- 4) 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.
- 5) 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.
 - 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.
- 6) CCTV will not be used for the purposes of streaming live worship services at All Saints' Church, Walsoken.
- 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 churches where sacramental confession or other ministries of individual pastoral support, such as healing, are practised, there should 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.
- 8) Exterior CCTV, or cameras in areas that are not used for public worship will remain in operation during services.

Reference Documents

ICO CCTV Code of Practice 2013

The Data Protection Act 2018

Procedure

Location and Signage

- 1) Cameras are sited to ensure that they cover the premises as far as is possible. Cameras are installed throughout the church site overing corridors, rooms pathways, buildings, and externally in vulnerable public facing areas.
- 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 the All Saints' Church, Walsoken's premises, which may include outdoor areas.
- 3) Signs are placed at main pedestrian entrances to inform church officers, visitors and members of the public that CCTV is in operation.
- 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 systems should be directed.
- 5) Signage templates (typical signs) are included in Diagram 1.

Monitoring and Recording

- 1) Cameras are monitored in the Tom Walters Room. The system is not linked to the police or other organisation.
- 2) The CCTV system is in a fixed and secure cabinet. The images cannot be viewed remotely.
- 3) Images are recorded on secure servers and are viewable by named Officers of All Saints' Church, Walsoken.
- 4) Remote servers or Cloud based type storage is not used.
- 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 compression of data does not reduce its quality.
- 6) Viewing monitors are password protected and switched off when not in use to prevent unauthorised use or viewing.

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- 7) The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked monthly to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate. This is recorded in the logbook.
- 8) All images recorded by the CCTV System remain the property and copyright of All Saints' Church, Walsoken.

Notes:

- 1) Covert surveillance is not allowed.
- 2) Facial recognition is not allowed (and not supported by the CCTV system).
- 3) Live streaming of CCTV is not allowed (and not supported by the CCTV system).

Data Protection Impact Assessments

- 1) 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.
- 2) Where existing CCTV systems are in operation as of May 2018, All Saints' Church, Walsoken will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system or within a 3-year period from the date of the implementation of GDPR, whichever is sooner.

Applications for Disclosure of Images

- 1) Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Churchwardens together with proof of identification. Further details of this process are detailed
 - a. The All saints' Church, Walsoken's Webpage
<https://allsaintswalsoken.co.uk/welcome/all-about-us/our-policies/>
 - b. Or can be obtained by contacting the Churchwardens
- 2) 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.
- 3) Where the All Saints' Church, Walsoken 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.
- 4) A request for images made by a third party should be made to the churchwardens.
- 5) 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.
- 6) Such disclosures will be made at the discretion of The Churchwardens of All Saints' Church, Walsoken, with reference to relevant legislation and where necessary. All Saints' Church, Walsoken may seek legal advice before any disclosure.
- 7) Where a suspicion of inappropriate behaviour arises and at the formal request of the investigating officer the churchwardens may provide access to CCTV images for use in the investigation.
- 8) A log of any disclosure made under this policy will be held by the Churchwardens itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
- 9) Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
- 10) Where information is disclosed, the disclosing officer must ensure information is transferred securely.
- 11) 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.
- 12) Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

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Retention of Images

- 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.
- 2) Where an image is required to be held more than the retention period of the Churchwardens 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.
- 3) Images held more than their retention period will be reviewed on a three-monthly basis and any not required for evidentiary purposes will be deleted.
- 4) Access to retained CCTV images is restricted to the Churchwardens and other persons as required and as authorised by All Saints' Church, Walsoken.

Review Procedure

- 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.
- 2) As part of the review of the churchwardens 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 achieve the stated purposes.

Responsibilities

- 1) The churchwardens are 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.
- 2) The churchwardens are responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- 3) The churchwardens are responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.

Forms

Form 1. The Church CCTV Logbook

The following should be recorded for each CCTV viewing session

- 1) Date.
- 2) Time.
- 3) Brief Description (System check, vandalism etc.).
- 4) Name of viewer/s.
- 5) Signature of viewer/s.
- 6) Any additional notes or system requirements (repairs, service etc).

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Diagrams

Diagram 1. Typical Signage Required



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Appendices

Appendix 1. CCTV related 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, and 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.

Facial/ automated recognition - the use of camera technology to identify individuals' faces and to make automated matches.

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.

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