



**St Mary's Ewell**

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# THE PAROCHIAL CHURCH COUNCIL OF THE ECCLESIASTICAL PARISH OF EWELL

Registered Charity No: 1128409

## POLICY FOR THE USE OF CCTV IN THE CHURCH AND EWELL HALL

Version 1.00

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## **Policy summary**

St Mary the Virgin Ewell Parish Church and Ewell Hall have in place Closed-Circuit Television (CCTV) surveillance systems. This policy details the purpose, use and management of the CCTV systems and details the procedures to be followed in order to ensure that St Mary's PCC complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures therein detailed, apply to all of the St Mary the Virgin Ewell and Ewell Hall CCTV systems capturing images of identifiable individuals for the purpose of viewing and or recording the activities of such individuals. CCTV images are monitored and recorded, stored, and accessed in strict accordance with this policy.

## **1 Introduction**

- 1.1 The Parochial Church Council of St Mary the Virgin, Ewell (PCC) is responsible for the use of CCTV systems at the Church and Ewell Hall. The images from these CCTV systems are used for the prevention, identification, and reduction of crime and to monitor the church, and hall 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 the church and hall contents and property.
- 1.2 The CCTV systems are owned and managed by the PCC and/or its appointed agents. The PCC is the system operator and data controller for the images produced by the CCTV systems, and is registered with the Information Commissioner's Office, Registration number ZA 519084
- 1.3 The CCTV systems are operational and are capable of being monitored for 24 hours a day, every day of the year. Rules governing access to the CCTV systems and recordings are detailed in this document.

## **2 Purpose**

- 2.1 This Policy governs the installation and operation of all CCTV cameras in the Church and Hall
- 2.2 CCTV surveillance is used to monitor and collect visual images for the purposes of:
  - protecting the buildings and assets.
  - 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 terms and conditions of use are respected so that the sites can be properly managed.

## **3 Scope**

- 3.1 This policy applies to both the Church and Hall.
- 3.2 This policy is applicable to and must be followed by all staff, Church members, consultants and contractors. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to volunteers, PCC and committee members.
- 3.3 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.
- 3.4 All systems 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 privacy considerations and fully understand these policies and procedures.

- 3.5 Where required, CCTV operators will be properly licensed by the Security Industry Authority. A license is not presently needed as the person overseeing the CCTV is undertaking the work as a volunteer and receives no payment in kind or a reward for services.

## **4 Definitions**

- 4.1 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 authorised to see it.
- 4.2 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.
- 4.3 Data Protection Act 2018 (DPA) - UK data protection framework, regulating the processing of information relating to individuals.
- 4.4 UK GDPR – UK General Data Protection Regulation
- 4.5 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.
- 4.6 Surveillance Camera Code of Practice - 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.
- 4.7 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.
- 4.8 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.

## **5 Policy statement**

- 5.1 The PCC will operate the CCTV systems in the church and hall in a manner that is consistent with respect for the individual's privacy.
- 5.2 The PCC complies with 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 systems may 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 systems 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.

- 5.5 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:
- 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.
- 5.7 Whenever possible interior CCTV will not record areas set aside for private devotions where one would not expect to be filmed while praying. Similarly, there should be no filming in the part or parts of the church or hall when used for sacramental confession or other ministries of individual pastoral support, such as healing. Whenever possible interior cameras will not be in use during any form of service, whether regular worship or occasional offices. If it is not practical to avoid filming, the live and recorded footage must not be viewed.
- 5.8 Exterior CCTV, or cameras in areas that are 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 is possible. Cameras are installed throughout the sites including roadways, car parks, buildings, and in vulnerable public facing areas.
- 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 the PCC's premises, which may include outdoor areas.
- 6.3 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.
- 6.4 The signage indicates that monitoring and recording is taking place, who the system is controlled by and where complaints/questions about the systems should be directed.

## **7 Monitoring and recording**

- 7.1 Church external cameras are routinely monitored in the parish office. Ewell Hall cameras can be routinely monitored remotely by the Hall Manager. Cameras and images can also be monitored for maintenance purposes.
- 7.2 Images are recorded on secure servers and are only viewable by persons and for purposes approved by the PCC in accordance with 5.7. These persons and purposes are
- Screens in Parish office - live data from external cameras used for safeguarding staff. The screens may be viewed by anyone in the parish office.

- Recorded data for the Church – used for detection of crime and to provide evidence if requested. Data can be accessed by Church Security manager, security officer, Churchwardens, and incumbent.
- Live and recorded hall data may be viewed by the Hall Manager for the following purposes:
  - Monitoring of end times of evening bookings and one-off parties.
  - To investigate abuse and damage of hall and its contents.
  - Live and recorded data may be viewed for maintenance purposes, by maintenance staff and the security manager.

7.3 The PCC has authority to delegate authorised users to access the data as required

7.4 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) are recorded reliably.

7.5 Systems used to view recorded images are password protected to prevent unauthorised use or viewing.

7.6 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked to ensure that the images remain fit for purpose and that the date and time stamp recorded on the images are accurate.

7.7 All images recorded by the CCTV System remain the property and copyright of the PCC.

7.8 All access to be logged and the reason for access to be recorded in the log. All logs to be reviewed by Security officer on a 6 monthly basis.

## **8 Covert surveillance**

8.1 Covert surveillance is not used.

## **9 Live Streaming**

9.1 CCTV is not used for live streaming of services.

## **10 Data Protection**

10.1 The PCC in its administration of its CCTV systems endeavours to comply with the Data Protection Regulations and with guidance from the Church of England.

### **Data Protection Impact Assessments**

10.2 All CCTV installations are subject to a Data Protection Impact Assessment identifying risks related to the installation and ensuring full compliance with data protection legislation.

### **Applications for subject access requests.**

- 10.3 Applications for Subject Access Requests must follow our Data Protection Policy. In addition, applications for disclosure of images are considered below.
- 10.4 Requests by individual data subjects for images relating to themselves via a Subject Access Request should in the first instance be submitted to the PCC secretary by email or in writing. Details are contained in our Data Privacy Notices. The PCC secretary must inform the Vicar, Churchwardens, Data Protection Compliance Officer, Security Manager and Security Officer within 24hrs of reading the email or written Subject Access Request.
- 10.5 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.
- 10.6 The PCC must give someone, who has a legitimate right to the data, a copy of the footage if it contains their data unless an exemption applies. If they agree, the PCC can arrange for them to view the footage, rather than receiving a copy. If the footage includes other people, there is a requirement to redact (e.g. edit or blur) it so they cannot be identified. However, the PCC is unable to redact the footage and will always seek advice from the Diocese as to how best to proceed. The PCC must document the reasons for their decision.
- 10.7 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 the Diocese.
- 10.8 Where a suspicion of misconduct arises and a formal request is made to the PCC, access to CCTV images may be provided to authorised persons.
- 10.9 A log of any disclosure made under this policy will be made, itemising the date, time, camera, requestor, reason for the disclosure requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
- 10.10 Where information is disclosed, the disclosing officer must ensure information is transferred securely.
- 10.11 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.
- 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 Where an image is required to be held in excess of the retention period the PCC will be responsible for authorising and actioning 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 11:1 above.
- 11.3 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.
- 11.4 Access to retained CCTV images is restricted to persons authorised by the PCC and other persons as required and as authorised by the Police.

## **12 Complaints Procedure**

- 12.1 The complaints procedure for the Church and Ewell Hall is detailed in our Data Privacy Notices which are available on the church website at [www.stmarysewell.com](http://www.stmarysewell.com) or via a link on the Ewell Hall website at [ewellhall.uk](http://ewellhall.uk)
- 12.2 When requested, anonymised information concerning complaints will be provided to the Biometrics and Surveillance Camera Commissioner.

## **13 Review Procedure**

- 13.1 There will be a 3 yearly review by the PCC 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 of the 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.

## **14 Responsibilities**

- 14.1 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.
- 14.2 The PCC is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
- 14.3 The 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	PCC
Policy owner	PCC
Policy author	Fr Mark Stafford, David Dance, Ian Burgess
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