

## **CCTV Policy . St Leonard's Church, Streatham**

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### **1. Introduction**

1.1 The Church has in place a CCTV surveillance system "the CCTV system". This policy details the purpose, use and management of the CCTV system at the Church and details the procedures to be followed in order to ensure that St. Leonard Church, Streatham complies with relevant legislation and the current Information Commissioner's Office Code of Practice.

1.2 The Church will have due regard to the Data Protection Act 1998, the General Data Protection Regulation (GDPR) and any subsequent data protection legislation, and to the Freedom of Information Act 2000, the Protection of Freedoms Act 2012 and the Human Rights Act 1998. Although not a relevant authority, St. Leonard Church, Streatham will also have due regard to the Surveillance Camera Code of Practice, issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles detailed there.

1.3 This policy is based upon guidance issued by the Information Commissioner's Office, 'In the picture: A data protection code of practice for surveillance cameras and personal information' ("the Information Commissioner's Guidance").

1.4 This policy and the procedures detailed, applies to all of St. Leonard Church, Streatham CCTV systems including webcams and any other system 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.

### **2. CCTV System overview**

2.1 The CCTV system is owned by St. Leonard Church, Tooting Bec Gardens, Streatham SW16 1HS and managed by the Church. Under the Data Protection Act 1998 the Church is the 'data controller' for the images produced by the CCTV system. The Church is registered with the Information Commissioner's Office and the registration number is ZA559914. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner's Guidance.

2.2 The Rector, Churchwardens and Church Administrator 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.

2.3 The CCTV system operates across the Church's premises only and not across external communal grounds. There are seven of cameras in operation.

2.4 Signs are placed on the general noticeboard in the narthex in order to inform employees and members of the public visiting the Church that CCTV is in operation. The signage indicates that the system is managed by St. Leonard Church, Streatham and the contact number of the Church Office is provided.

2.5 The Church Administrator in conjunction with the Churchwardens is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

2.6 Cameras are sited to ensure that they cover the Church's premises as far as is possible. Cameras are installed on the church roof and above external doorways.

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

2.8 Any proposed new CCTV installation is subject to a Privacy Impact Assessment.

2.9 Further information regarding the number and location of CCTV cameras is available in the Church Office.

### **3. Purposes of the CCTV system**

3.1 The principal purposes of St. Leonard Church, Streatham system are as follows: - for the prevention, reduction, detection and investigation of crime and other incidents; - to ensure the safety of employees, clergy and members of the public who are visitors; - to assist in the investigation of suspected breaches of employment or public order regulations by employees, clergy or members of the public who are visitors to the Church.

3.2 The CCTV system will be used to observe the entrances to the Church's building and the Church roof under surveillance in order to identify incidents requiring a response. Any response should be proportionate to the incident being witnessed.

3.3 The Church seeks to operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

### **4. Monitoring and Recording**

4.1 Cameras are monitored in the Church Office, which is a secure area, staffed on a part time basis.

4.2 Images are recorded centrally on servers located securely in the Church Office, and are viewable only in the Church Office by the Rector, Churchwardens and Church Administrator. Additionally, other relevant roles may be authorised by the Rector and Churchwardens to monitor cameras sited within the Church and communal areas of responsibility i.e. designated Safeguarding Officers, nominated members of Church Watch on a view only basis.

4.3 There is an internal screen monitor linked directly to the camera sited over the South Porch door. This is to provide safeguarding for employees, clergy or members of the public by ascertaining who is trying to gain access to the building through this entrance.

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

4.4 All images recorded by the CCTV System remain the property and copyright of St. Leonard Church, Streatham.

4.5 The monitoring of employee, clergy and volunteer activities will be carried out in accordance with Part 3 of the Employment Practices Code 2.

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### **5. Compliance with Data Protection Legislation**

5.1 In its administration of its CCTV system, St. Leonard Church, Streatham complies with the Data Protection Act 1998. Due regard is given to the data protection principles embodied in the Data Protection Act. These principles require that personal data shall be: a) processed fairly and lawfully; b) held only for specified purposes and not used or disclosed in any way incompatible with those purposes; c) adequate, relevant and not excessive; d) accurate and kept up to date; e) be kept longer than necessary for the particular purpose; f) processed in accordance with the rights of individuals; g) kept secure; and h) not be transferred outside the European Union and Economic Area unless the recipient country ensures an adequate level of protection.

5.2 Since 25 May 2018, the Church has also complied with the General Data Protection Regulation. Due regard will be given to the data protection principles contained within Article 5 of the GDPR which provide that personal data shall be:

- a) processed lawfully, fairly and in a transparent manner;
- b) collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes;
- c) adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed;
- d) accurate and, where necessary, kept up to date;
- e) kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed; and
- f) processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage, using appropriate technical or organisational measures.

### **6. Applications for disclosure of images Applications by individual data subjects**

6.1 Requests by individual data subjects for images relating to themselves "Subject Access Request" should be submitted in writing to the Church's Administrator together with proof of identification. Further details of this process can be obtained from the Church Office.

6.2 In order to locate the images on the Church's 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.

6.3 Where the 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.

6.4 A request for images made by a third party should be made in writing to the Rector and Churchwardens.

6.5 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.

6.6 Such disclosures will be made at the discretion of the Rector and Churchwardens with reference to relevant legislation.

6.7 Where a suspicion of misconduct arises a formal request to the Rector and Churchwardens may provide relevant access to CCTV images for use in employees disciplinary cases.

6.8 The Rector and Churchwardens may provide access to CCTV images when sought as evidence in relation to employee discipline cases.

6.9 A record of any disclosure made under this policy will be held on the CCTV management system, itemising the date, time, camera, requestor, authoriser and reason for the disclosure.

## **7. Retention of images**

7.1 Unless required for evidential purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 days from the date of recording. Images will be automatically overwritten after this point.

7.2 Where an image is required to be held in excess of the retention period referred to in 7.1, the Rector and Churchwardens or their nominated deputy, will be responsible for authorising such a request.

7.3 Images held in excess of their retention period will be reviewed on a three-monthly basis and any not required for evidential purposes will be deleted.

7.4 Access to retained CCTV images is restricted to the Rector, Churchwardens and Church Administrator and other persons as required and as authorised by the Rector, Churchwardens].

## **8. Complaints procedure**

8.1 Complaints concerning the Church's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Churchwardens at: [office@stleonard-streatham.org.uk](mailto:office@stleonard-streatham.org.uk)

8.2 All appeals against the decision of the the Churchwardens should be made in writing to the Rector at [rectorstleonards@btinternet.com](mailto:rectorstleonards@btinternet.com)

## **9. Monitoring Compliance**

9.1 All roles designated to be involved in the operation of the Church's CCTV System i.e., the Rector, Churchwardens and Church Administrator 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 detailed purposes and procedures.

9.2 All roles with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

## **10. Policy review**

10.1 The Church's usage of CCTV and the content of this policy shall be reviewed annually by the Rector, Churchwardens and PCC with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

**January 2024**