

Ottery St Mary Parish Church

CCTV Policy

Introduction

Ottery St Mary Parish Church 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 PCC complies with relevant legislation and Codes of Practice where necessary.

The CCTV system is owned and managed by the PCC and is registered with the Information Commissioner's Office, Registration number ICO:00013787738.

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

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

All staff and volunteers involved in the operation of the CCTV System will be made aware of this policy and procedure and will have relevant skills and training on the operational, technical and privacy considerations.

Policy Statement

Ottery PCC will operate its CCTV system in a manner that is consistent with respect for the individual's privacy. 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.

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.

The use of the CCTV system will be conducted in a professional, ethical and legal manner.

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.

CCTV will not be used for the purposes of streaming live services held in the church.

Due to the impracticality of turning off cameras before an act of worship and the need for security for the vicar during Evening Prayer when she is often in church alone, CCTV will remain in operation at these times. However, footage will never be accessed or reviewed unless an incident occurs during these times.

Recording is visual only. There is no sound.

Location of cameras

Cameras are sited to ensure that they cover the premises as far as is possible. Every effort is made to position cameras so that their coverage is restricted to the church's premises, which may include outdoor areas.

Signs are placed at all pedestrian entrances in order to inform staff, church officers, visitors and members of the public that CCTV is in operation.

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.

Cameras are monitored in a secure area (the vicars' vestry) which has limited access. The monitor screen is only turned on when CCTV needs to be reviewed or for a regular check to make sure cameras are functioning. The search function, for viewing recorded footage, is password protected. The live camera view can also be accessed on the church office PC, which is password protected.

Recorded material will be stored for 32 days only before it is automatically deleted. If material is downloaded, for example if police are unable to attend to view an incident within 7 days, the images are downloaded onto a USB stick to be kept in the possession of the parish administrator in a secure location.

All images recorded by the CCTV System remain the property and copyright of the PCC of Ottery ST Mary Parish Church.

Covert surveillance

Covert surveillance is the use of hidden cameras observe and/or record the activities of a subject which is carried out without their knowledge. The PCC of Ottery St Mary will not engage in covert surveillance.

Data Protection

In its administration of its CCTV system, the PCC complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and in accordance with the PCC's Data Privacy Notice. Any proposed new CCTV installation is subject to a Data Protection Impact Assessment.

Applications for disclosure of images

Footage can only be viewed by a designated data controller, who will ensure nobody else views the video data, without a valid reason. If someone wants to view their video recording, they can do so by submitting a Subject Access Request (SAR). If the footage includes other people, their consent needs to be obtained. Where this isn't possible or appropriate, the requester's rights need to be balanced

against any third-party rights to privacy. Reasons for any decision made in relation to allowing or denying disclosure should be documented.

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 incumbent with reference to relevant legislation and where necessary, following advice from the Diocesan Registrar.

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

Where information is disclosed, it must be 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.

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

Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 7 calendar days from the date of recording. Images will be automatically overwritten after this time.

Where an image is required to be held in excess of the retention period the incumbent/church warden 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. 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 the parish administrator and other persons as required and as authorised by the incumbent.

Complaints Procedure

Complaints concerning the PCC's use of its CCTV system or the disclosure of CCTV images should be made to the church warden/incumbent.

Review Procedure

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.