



ST. MARY THE VIRGIN

Parochial Church Council of Burnham on Crouch CCTV policy

Policy summary

The Parochial Church Council of Burnham on Crouch ("St Marys PCC") 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 St Marys PCC complies with relevant legislation and statutory Codes of Practice where necessary.

This policy and the procedures therein detailed, applies to all of St Marys PCC's 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 in strict accordance with this policy.

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Introduction

1. The Parochial Church Council of Burnham on Crouch ("St Marys PCC") uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the church buildings of St Marys Burnham on Crouch in order to provide a safe and secure environment for clergy, church officers, volunteers and visitors and to prevent the loss of or damage to church contents and property.
2. The CCTV system is owned by St Marys PCC (Registered address: 2A Church Road, Burnham on Crouch, Essex, CM0 8DA), and managed by the duly appointed Church Wardens of St Marys PCC. St Marys PCC 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 ZB881819.
3. The CCTV system is operational and is capable of monitoring for 24 hours a day, every day of the year.

Purpose

4. This Policy governs the installation and operation of all CCTV cameras at St Marys Church Burnham on Crouch.
5. CCTV surveillance is used to monitor and collect visual images for the purposes of:
 - protecting the buildings and assets, both during services (externally) or opening hours, and after hours;
 - promoting the health and safety of clergy, church officers, 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 site/s can be properly managed.

Scope

6. This policy applies to St Marys PCC, and any of its buildings monitored by the CCTV system.
7. This policy is applicable to, and must be followed by all officers and volunteers of St Marys PCC.
8. All church officers and/or volunteers 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.
9. All systems users 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.
10. The CCTV System will solely be used to identify and monitor the activities of intruders/trespassers, and for protection against theft or damage to premises or property. As such, the church officers operating the CCTV system are not required to hold an SIA licence.

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.

Security Industry Authority (SIA) - the organisation responsible for regulating the private security industry in the UK, under which private use of CCTV is licensed.

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.

Policy

Policy statement

11. St Marys PCC will operate its CCTV system in a manner that is consistent with respect for individual privacy.
12. ST Marys PCC 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.
13. The CCTV system will be used to observe the areas under surveillance in order to identify incidents requiring a response.
14. 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.
15. Cameras will be sited so they only capture images relevant to the purposes for which they are installed. In addition, equipment will 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.
16. Interior CCTV will not record areas set aside for regular worship, occasional offices, prayer, or private devotions. Where interior cameras cover spaces that are only infrequently used for such purposes, they will be switched off during such use.
17. Exterior CCTV and cameras in areas that are not used for public worship will remain in operation during services.

Location and signage

18. Cameras are sited to ensure that they cover access to the premises as far as is possible.

19. 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 premises of St Marys church, which may include outdoor areas.
20. Signs are placed at all public entrances in order to inform visitors and members of the public that CCTV is in operation.
21. The signage indicates that monitoring and recording is taking place and for what purposes.
22. Further details as to the hours of operation, who the system owner is and where complaints/questions about the systems should be directed can be found in this policy on the St Mary's Church website (<https://stmarysburnham.co.uk/>).

Monitoring and recording

23. CCTV footage will be monitored in a secure and private space.
24. Images are recorded on secure servers and are viewable by Church Wardens and/or other authorised church officers.
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. Access to CCTV footage is password protected to prevent unauthorised use or viewing.
27. 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.
28. All images recorded by the CCTV System remain the property and copyright of the St Marys PCC.

Covert surveillance

29. Covert surveillance is the use of hidden camera's or equipment to observe and/or record the activities of a subject which is carried out without their knowledge.
30. St Marys PCC will not engage in covert surveillance.

Live Streaming

38. CCTV will never be used for live streaming of services, as it is intended solely for safety and security purposes.

Data Protection

40. In its administration of its CCTV system, St Marys complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Data Protection Impact Assessments

41. 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.

Applications for disclosure of images

42. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Church Wardens at stmaryschurchburnham@outlook.com together with proof of identification.
43. In order to locate the images on the system sufficient detail as to date and time must be provided by the data subject in order to allow the relevant images to be located and the data subject to be identified.
44. A request for images made by a third party should be made to the Church Wardens at stmaryschurchburnham@outlook.com.
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 Wardens, with reference to relevant legislation and where necessary.
47. A log of any disclosure made under this policy will be held by the Church Wardens 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. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
49. 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.
50. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of images

51. Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 30 calendar days from the date of recording. Images will be automatically overwritten or destroyed after this time.
52. Where an image is required to be held in excess of the retention period the 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.
53. Access to retained CCTV images is restricted to Church Wardens and/or other authorised officers of St Marys PCC.

Complaints Procedure

54. Complaints concerning St Marys PCC's use of its CCTV system or the disclosure of CCTV images should be made to the Church Wardens at stmaryschurchburnham@outlook.com.

Review Procedure

55. 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.
56. As part of the review of the St Marys 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 and the provisions of this policy;
 - whether there are alternative and less intrusive methods for achieve the stated purposes.

Responsibilities

57. The Church Wardens of St Marys PCC 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.
58. The Church Wardens of St Marys PCC are responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
59. The Church Wardens of St Marys PCC are responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.

Approval and review

Approved by	St Marys PCC
Date	28 th April 2025
Review date	31 st December 2025

