



St Mary's Church, Plaistow, Bromley

61 College Road,
Bromley, Kent
BR1 3QG

CCTV Policy

Policy summary

St Mary's Church, Plaistow, Bromley 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 St Mary's Church, Plaistow, Bromley complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures therein detailed, applies to all of St Mary's Church, Plaistow, Bromley's CCTV systems including covert installations 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. St Mary's Church, Plaistow, Bromley uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the Church House 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 St Mary's Church, Plaistow, Bromley contents and property.
2. The CCTV system is owned by St Mary's Church, Plaistow, Bromley, 61 College Road, Bromley, Kent, BR1 3QG and managed by the Parochial Church Council of the Ecclesiastical Parish of St Mary's, Plaistow, Bromley (PCC) and 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 ZB329099
3. The CCTV system is operational and is capable of being monitored 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 Mary's Church, Plaistow, Bromley.
5. CCTV surveillance is used to monitor and collect visual images for the purposes of:
 - protecting the buildings and assets, both during office hours, and after hours;
 - 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 rules are respected so that the site/s can be properly managed.

Scope

6. This policy applies to St Mary's Church, Plaistow, Bromley, and also to any separate legal entities owned and controlled by them which occupy premises controlled by the CCTV system.
7. This policy is applicable to, and must be followed by, all staff including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to volunteers, trustees and committee members.
8. 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.
9. All systems users (staff, volunteers, 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.
10. Where required, CCTV operators will be properly licenced by the Security Industry Authority as follows:

A licence is not needed if the person overseeing the CCTV is undertaking the work as a volunteer and receives no payment in kind or a reward for services. If the person in charge of this is a churchwarden, a licence may not be needed. The PCC should consider who is best placed to hold the licence (churchwarden or minister) to reduce disruption with changing personnel.

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.

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

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

General Data Protection Regulations 2016 (GDPR) - European Union data protection framework, regulating the processing of information relating to individuals.

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 licenced. 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.

Policy

Policy statement

11. St Mary's Church, Plaistow, Bromley will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

12. St Mary's Church, Plaistow, Bromley 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. Any response should be proportionate to the incident being witnessed.
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 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.
16. CCTV will **not** be used for the purposes of streaming live services held in the Church.
17. Exterior CCTV, or 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 the premises as far as is possible. Cameras are installed throughout the site including roadways, car parks, buildings, premises, within buildings and externally in vulnerable public facing areas.
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 St Mary's House and Hall premises, which may include outdoor areas.
20. 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.
21. 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.

Monitoring and recording

22. Cameras are monitored in a secure private office.
23. Images are recorded on secure servers and are viewable by the Data Protection Officer and Parish Administrator. Additional staff may be authorised by the PCC to monitor cameras sited within their own areas of responsibility on a view only basis.

24. 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.
25. Recordings should be password protected and switched off when not in use to prevent unauthorised use or viewing.
26. 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 is accurate.
27. All images recorded by the CCTV System remain the property and copyright of the St Mary's Church, Plaistow, Bromley.

Facial Recognition

35. Where cameras are used to identify people's faces, St Mary's Church, Plaistow, Bromley will ensure the use of high quality cameras to make sure they are capturing the individual accurately enough to fulfil the intended purpose.
36. Any use of such automated technologies must involve some level of human interaction and should not be done on a purely automated basis.

Data Protection

39. In its administration of its CCTV system, the St Mary's Church, Plaistow, Bromley complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and in accordance with St Mary's Church, Plaistow, Bromley Data Protection Policy.
40. 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

Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Data Protection Officer together with proof of identification. Further details of this process are detailed on the St Mary's Bromley website <https://www.stmarys-bromley.org.uk/community/church-house-and-hall/cctv/> OR can be obtained by contacting St Mary's Church Parish Office, 61 College Road, Bromley, Kent BR1 3QG - admin@stmarys-bromley.org.uk

41. 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.
42. Where St Mary's Church, Plaistow, Bromley 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.

43. 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.
44. Such disclosures will be made at the discretion of the Parochial Church Council of the Ecclesiastical Parish of St Mary's, Plaistow, Bromley, with reference to relevant legislation and where necessary, following advice from our legal advisor.
45. Where a suspicion of misconduct arises and at the formal request of the Investigating Officer or Advisor, the Parochial Church Council of the Ecclesiastical Parish of St Mary's, Plaistow, Bromley may provide access to CCTV images for use in staff disciplinary cases.
46. A log of any disclosure made under this policy will be held by the Data Protection Officer itemising the date, time, camera, requestor, reason for the disclosure; lawful basis for disclosure; date of decision and/or release, name of authoriser.
47. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
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 two months 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 Parochial Church Council of the Ecclesiastical Parish of St Mary's, Plaistow, Bromley 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 54 below.
53. 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.
54. Access to retained CCTV images is restricted to the Data Protection Officer and other persons as required and as authorised by the Data Protection Officer.

Complaints Procedure

55. Complaints concerning the St Mary's Church, Plaistow, Bromley use of its CCTV system or the disclosure of CCTV images should be made to The Data Controller, St Mary's Church Parish Office, 61 College Road, Bromley, Kent BR1 3QG - admin@stmarys-bromley.org.uk
56. The complaints procedure is available on the St Mary's Bromley website here: <https://www.stmarys-bromley.org.uk/community/church-house-and-hall/cctv/>

57. When requested, anonymised information concerning complaints will be provided to the Surveillance Commissioner.

Review Procedure

58. 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.

59. As part of the review of the Parochial Church Council of the Ecclesiastical Parish of St Mary's, Plaistow, Bromley 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 achieving **or** to achieve the stated purposes.

Responsibilities

60. The Data Protection Officer 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.

61. The Data Protection Officer is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

62. The Parochial Church Council of the Ecclesiastical Parish of St Mary's, Plaistow, Bromley is responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.



St Mary's Bromley

61 College Road,
Bromley, Kent
BR1 3QG

ST MARY, PLAISTOW, BROMLEY

CCTV Complaints Procedure

If individuals feel that the church CCTV system is not being operated as set out in our policy, or that their request for access to a CCTV image has not been dealt with in a satisfactory manner they can complain and a review will be carried out.

We aim to respond to any complaints made within 30 working days. Should you wish to make a complaint, please do this in writing to

The Data Controller
St Mary's Church Parish Office
61 College Road
Bromley
Kent
BR1 3QG
admin@stmarys-bromley.org.uk

If you are unhappy with our response or you need advice you can contact the Information Commissioner's Office
(ICO) icocasework@ico.org.uk
Telephone: 0303 123 1113 Textphone: 01625 545860
Monday to Friday, 9am to 4:30pm

Information Commissioner's Office
Wycliffe House Water Lane
Wilmslow Cheshire SK9 5AF

Appendix 1 – CCTV Template Signage



CCTV

**Images are being monitored for
the purpose of public safety,
crime prevention, detection and
presecution of offenders.**

The scheme is controlled by

For further Information contact



CCTV

Images are being monitored [redacted] hours a day for the purpose of public safety, crime prevention, detection and prosecution of offenders.

The scheme is controlled by

[redacted]

For further information contact

[redacted]