

# The Joint Council of Holy Trinity and St James'

## Policy summary

The Joint Council of Holy Trinity and St James' 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 Holy Trinity and St James' complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures therein detailed, applies to all of the Holy Trinity and St James' 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.



## Introduction

1. The Joint Council of Holy Trinity and St James' uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the Holy Trinity church in order to provide a safe and secure environment for staff, clergy, church officers, volunteers, visitors and to prevent the loss of or damage to Holy Trinity contents and property.
2. The CCTV system is owned by the Joint Council of Holy Trinity and St James'. They are the system operator, and data controller, for the images produced by the CCTV system, and are registered with the Information Commissioner's Office, Registration number C1642667.
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 Holy Trinity church.
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 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 the JCC, and also to any separate legal entities owned and controlled by them which occupy premises controlled by the CCTV system.
7. Where a system is jointly owned or jointly operated, the governance and accountability arrangements are agreed between the partners and documented so that each of the partner organisations has clear responsibilities, with clarity over obligations and expectations and procedures for the resolution of any differences between the parties or changes of circumstance.
8. This policy is applicable to, and must be followed by, all trustees, volunteers, consultants and contractors. Failure to comply could result in disciplinary action, including dismissal.
9. 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.
10. 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.

11. Where required, CCTV operators will be properly licensed by the Security Industry Authority as follows:
- A license is required for cathedrals and churches where CCTV is used for wider security purposes and the system is staffed by paid security staff.
  - A minister who is listed as the CCTV operator, as a fixed entity/person, will be treated as an “employee” and will therefore require a license.
  - A license 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 license may not be needed. The JCC should consider who is best placed to hold the license (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 camera's 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.

UK GDPR – UK General Data Protection Regulation

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](#).

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.

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

12. The JCC of Holy Trinity and St James' will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
13. The JCC of Holy Trinity and St James' 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.
14. 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.
15. 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.
16. 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.
17. CCTV will **not** be used for the purposes of streaming live services held in the churches
18. Interior CCTV will not record areas set aside for private devotions where one would not expect to be filmed while praying. Similarly, in any churches where sacramental Confession or other ministries of individual pastoral support, such as healing, are practised, there should be no filming in the part or parts of the church set aside for such purposes. Interior cameras will not be in use during any form of service, whether regular worship or occasional offices.
19. Exterior CCTV, or cameras in areas that are not used for public worship will remain in operation during services.

## Location and signage

20. Cameras are sited to ensure that they cover the premises as far as is possible. Cameras are installed in Holy Trinity Church
21. 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 church, which may include outdoor areas.
22. 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.
23. 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.

24. Signage templates are included in Appendix 1.

## Monitoring and recording

25. Cameras are only checked when necessary.

26. For churches where CCTV is added for security purposes, a fixed and secure lockbox/cabinet could be used for monitoring and viewing CCTV images, and the data can be accessed via a wireless device. The box may be hidden in an open space, and the data broadcasted over a private server and made available via a live stream to the operator.

27. Images are recorded on secure servers and are viewable only by personnel authorised by the JCC.

28. Where churches are using Cloud-based storage they will ensure that such storage is located in the UK or European Economic Area (EEA), and that all relevant security and data protection measures are in place.

29. 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.

30. Viewing monitors should be password protected and switched off when not in use to prevent unauthorised use or viewing.

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

32. All images recorded by the CCTV System remain the property and copyright of the JCC.

## Covert surveillance

33. 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.

34. The JCC will not engage in covert surveillance.

## Live Streaming

35. CCTV is not suitable for live streaming of services, as it is intended solely for safety and security purposes.

36. Churches wishing to live stream services must use additional filming equipment and/or devices, and follow the guidance published on the Church of England website here: <https://www.churchofengland.org/media/22304>

## Data Protection

37. In its administration of its CCTV system, the JCC complies with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 and in accordance with the JCC's Data Protection Policy.

## **Data Protection Impact Assessments**

38 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**

39. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the incumbent together with proof of identification.
40. 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.
41. You must give someone a copy of the footage if it contains their data, unless an exemption applies. If they agree, you can arrange for them to view the footage, rather than receiving a copy. If the footage includes other people, you will need to redact (eg edit or blur) it so they can't be identified. You should consider the level of harm for those people if you don't redact. If you can't redact the third party footage, you'll need to consider asking for their consent before releasing it. Where this isn't possible or appropriate, you must balance the requester's rights against any third-party rights to privacy and decide if it's reasonable to share the footage without their consent. You should look to disclose the personal data if you can, but it's a balancing act. Document the reasons for your decision.
42. 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.
43. Such disclosures will be made at the discretion of the incumbent, with reference to relevant legislation and where necessary, following advice from the diocese.
44. A log of any disclosure made under this policy will be held by the incumbent itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
45. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
46. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
47. 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.
48. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

## Retention of images

49. 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.
50. Where an image is required to be held in excess of the retention period the Churchwardens 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.
51. 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.
52. Access to retained CCTV images is restricted to JCC and other persons as required and as authorised by the incumbent.

## Complaints Procedure

53. Complaints concerning the JCC's use of its CCTV system or the disclosure of CCTV images should be made to the incumbent.
54. The complaints procedure is available in the policy file in church.
55. When requested, anonymised information concerning complaints will be provided to the Surveillance Commissioner.

## Review Procedure

56. 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.
57. As part of the review of the JCC 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 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.

## Responsibilities

58. The JCC 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.
59. The JCC is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
60. The Data Protection Officer 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 JCC	
Date	28/01/2025
Review date	January 2026

## 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]