



St Columba's Church of Scotland

CCTV Policy

Policy summary

St Columba's Church of Scotland 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 Columba's complies with relevant legislation and Codes of Practice where necessary.

This policy and the procedures therein detailed, applies to all of the St Columba'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.

Introduction

1. St Columba's Church of Scotland uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime and to monitor the church building in order to provide a safe and secure environment for staff, minister(s), church officers, volunteers and visitors, and to prevent the loss of or damage to St Columba's contents and property.
2. The CCTV system is owned & managed by St Columba's Church of Scotland. We are registered as part of the Presbytery of England with the Information Commissioner's Office, Registration number ZA134744
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 Columba's Church of Scotland.
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, minister(s),volunteers, and visitors;

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- 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

Scope

6. This policy applies to St Columba's Church of Scotland 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, committee members and hall hire customers.
8. All staff and trustees 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 & trustees 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.

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.

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UK General Data Protection Regulations, 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.

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

10. St Columba's Church of Scotland will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
11. St Columba's Church of Scotland 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.
12. 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.
13. 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.
14. 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);

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- minimise risk of damage or theft.
15. CCTV will **not** be used for the purposes of streaming live services held in the church. See section on “Live Streaming” on page 4.
 16. Interior CCTV will not record areas set aside for private devotions where one would not expect to be filmed while praying.

Location and signage

17. Cameras are sited to ensure that they cover the premises as far as is possible. Cameras are installed in the entrance vestibule, side door and entrance door on Lennox Gardens.
18. 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 St Columba's premises.
19. Signs are placed at all pedestrian entrances in order to inform staff, church officers, visitors, hall hire customers, support groups and members of the public that CCTV is in operation.
20. The signage indicates that monitoring and recording is taking place, who the scheme controller is and where further information is available. Complaints/questions about the systems should be directed to Lucy Llewellyn, Church Office Manager.
21. Signage templates are included in Appendix 1.

Monitoring and recording

22. Cameras are monitored in a secure private office.
23. Images are recorded on secure servers and are viewable by Lucy Llewellyn, Church Office Manager, Michael Dempsey, Church Officer, Paul Dempsey, Church Caretaker, Bernadette McAllister Szober, Church Caretaker, Charlotte Bradford, Trustee, Elizabeth Fox, Trustee and Susan Pym, Data Protection Officer. Additional staff may be authorised by the Session Clerk/Fabric Convenor 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.

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25. Viewing monitors 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 daily 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 St Columba's Church of Scotland.

Covert surveillance

28. St Columba's Church of Scotland will not engage in covert surveillance.

Live Streaming

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

Data Protection

30. St Columba's Church of Scotland in its administration of its CCTV system, complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and in accordance with Data Protection Policy.

Applications for disclosure of images

31. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to Mrs Susan Pym, Data Protection Officer for St Columba's Church of Scotland together with proof of identification. Further details of this process can be obtained by contacting Lucy Llewellyn, Church Office Manager.
32. 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.
33. Where St Columba's Church of Scotland 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.
34. 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

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or in other circumstances where an exemption applies under relevant legislation.

35. Such disclosures will be made at the discretion of Mrs Susan Pym, Data Protection Officer, with reference to relevant legislation and where necessary, following advice from our legal representatives, Withers LLP.
36. A log of any disclosure made under this policy will be held by Mrs Susan Pym, Data Protection Officer itemising the date, time, camera, requestor, reason for the disclosure; requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
37. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
38. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
39. 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.
40. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of images

41. Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 21 calendar days from the date of recording. Images will be automatically overwritten or destroyed after this time.
42. Where an image is required to be held in excess of the retention period, Mrs Susan Pym, Data Protection Officer, 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 51 above
43. 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.
44. Access to retained CCTV images is restricted to the Data Protection Officer and other persons as required and as authorised by Mrs Charlotte Bradford, Session Clerk.

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Complaints Procedure

45. Complaints concerning the St Columba's Church of Scotland use of its CCTV system or the disclosure of CCTV images should be made to Susan Pym, Data Protection Officer.
46. The complaints procedure is available on the St Columba's Church of Scotland website here: www.stcolumbas.org.uk
47. When requested, anonymised information concerning complaints will be provided to the Information Commission.

Review Procedure

48. 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.
49. As part of the review of St Columba's Church of Scotland 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 to achieve the stated purposes.

Responsibilities

50. St Columba's Church of Scotland 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.
51. St Columba's Church of Scotland is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.
52. The Data Protection Officer is responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.

Lucy Llewellyn, Church Office Manager

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Appendix One- Signage



on SW1X 0BD

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