St Nicholas Church Arundel

CCTV policy

Policy summary

St Nicholas' Church, London Road, Arundel has 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 Parochial Church Council complies with relevant legislation and Codes of Practice where necessary.

CCTV images are monitored and recorded in strict accordance with this policy.

Approval and review

Approved by	PCC
Policy owner	PCC
Policy author	Churchwardens
Date	September 2025
Review Date	September 2026

Introduction

1. St Nicholas Church Arundel uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime, to monitor the church in order to provide a safe and secure environment for clergy, staff, church officers, worshippers, volunteers and visitors, and to prevent the loss of or damage to the church's contents and property.

2. The CCTV system is owned by St Nicholas Parish Church, London Rd, Arundel BN18 9AT. The churchwardens act as the Data Controller and System Operator.

3. The CCTV system is operational and 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 Nicholas Church.

5. CCTV surveillance is used to monitor and collect visual images for the purposes of:

    i.   protecting the church building;
    ii.   promoting the safety of clergy, staff, church officers, worshippers, volunteers and visitors;
    iii. reducing the incidence of crime and anti-social behaviour (including theft and vandalism);
    iv.   supporting the Police in a bid to deter and detect crime;
    v.   assisting in identifying, apprehending and prosecuting offenders.

Scope

6. This policy applies to St Nicholas' Church Arundel.

7. This policy is applicable to, and must be followed by, all clergy and staff, including consultants and contractors. Failure to comply could result in disciplinary action, including dismissal. This policy also applies to all volunteers, trustees (Parochial Church Council members), and people using the church for events.

8. All staff 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 staff 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 licensed by the Security Industry Authority.

Definitions

11. CCTV: closed circuit television camera. A TV system in which signals are not publicly distributed but are monitored, primarily for security purposes and where access to their content is limited by design only to those able to see it.

12. Data Controller: the church officers responsible for determining how and why personal data is processed.

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

14. 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.

15. System Operator: the person or persons that take a decision to deploy a surveillance system, are responsible for defining its purpose, and are responsible for the control of the use or the processing of images or other information obtained by virtue of such system.

16. System User: person or persons who have access to live or recorded images or other information obtained by virtue of such a system.

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

Policy Statement

18. The Parochial Church Council of St Nicholas Arundel will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.

19. The Parochial Church Council of St Nicholas Arundel complies with the Information Commissioner's Office (ICO) CCTV Code of Practice 2013 to ensure CCTV is used responsibly and safeguards both trust and confidence in its continued use.

20. The CCTV system will be used to observe the areas under surveillance in order to identify incidents requiring a response. Any response will be proportionate to the incident being witnessed.

21. 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.

22. 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:

    i. cover the specific area to be monitored only;
    ii. keep privacy intrusion to a minimum;
    iii. ensure that recordings are fit for purpose and not in any way obstructed;
    iv. minimise risk of damage or theft.

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

24. CCTV will not record areas explicitly set aside for private devotions. Similarly, sacramental Confession or other pastoral ministries will not be filmed. Cameras revealing the identity of worshippers will not be used during any form of service, whether regular worship or occasional offices.

Location and signage

25. Cameras are installed throughout the interior of the building. This includes all entrances and the Parish Office and Sacristy.

26. The location of equipment is carefully considered to ensure that images captured comply with data protection requirements.

27. Signs are placed at the church gates and in the south porch (main church entrance) in order to inform clergy, staff, church officers and members of the public that CCTV is in operation.

28. 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

29. Cameras are monitored in a secure private office.

30. Images are recorded onto secure storage and are viewable by the Churchwardens, Vicar and Parish Administrator.

31. If Cloud-based storage is employed the church will ensure that such storage will be located in the European Economic Area (EEA), and that all relevant security and data protection measures are in place.

32. 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.

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

34. 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.

35. All images recorded by the CCTV System remain the property and copyright of St Nicholas' Church Parochial Church Council.

Data Protection

36. In its administration of its CCTV system, St Nicholas Church Parochial Church Council complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018.

Applications for disclosure of images

37. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the Parish Administrator together with proof of identity.

38. 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.

39. Where the church 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.

40. A request for images made by a third party should be made to the Parish Administrator in the way shown by paragraph 38. This would occur 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.

41. Such disclosures will be made at the discretion of the System Operator with reference to relevant legislation and where necessary, following advice from the diocesan legal advisor etc.

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

43. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.

44. Where information is disclosed, the disclosing officer must ensure information is transferred securely.

45. 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.

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

Retention of images

47. 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.

48. Where an image is required to be held in excess of the 31 day retention period, the System Operator will be responsible for authorising such a request, and recordings will be protected against loss and will be retained for 6 months following date of last action and then disposed of.

49. 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.

50. Access to retained CCTV images is restricted to the Vicar, Parish Administrator and other persons as required and as authorised by the System Operator.

Complaints Procedure

51. Complaints concerning the church's use of its CCTV system or the disclosure of CCTV images should be made to the Data Controller via the Parish Administrator.

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

Review Procedure

53. 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.

54. As part of the review the Parochial Church Council of St Nicholas' Church, Arundel will assess:

    i.   whether the location of cameras remains justified in meeting the stated purpose and whether there is a case for removal or relocation.
    ii. the hours of operation are appropriate.
    iii. whether there are alternative and less intrusive methods to achieve the stated purposes.

Responsibilities

55. The System Operator 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.

56. The System Operator is responsible for ensuring that adequate signage is erected in compliance with the ICO CCTV Code of Practice.

57. The System Operator is responsible for authorising the disclosure of images to data subjects and third parties and for maintaining the disclosure log.