



# Romford

## BAPTIST CHURCH

### CCTV Policy

### Romford Baptist Church

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### **1. Introduction**

- 1.1 Romford Baptist Church "the Church" has in place a CCTV surveillance system "the CCTV system" across the buildings and the whole site. This policy will detail the use, management and purpose of the CCTV system at the Church and details the procedures which will be followed in order to ensure that the Church complies with the relevant legislation and the current Information Commissioner's Office ("ICO") Code of Practice
- 1.2 The Church will pay attention to the Data Protection Act 1998, the UK General Data Protection Regulation (GDPR) and any other subsequent data protection legislation and the Freedom Information Act 2000, the Protection of Freedoms Act 2012 and the Humans Rights Act 1998. The Church will also pay attention to the Surveillance Camera Code of Practice (please note however that this is not a relevant authority) which was issued under the Protection of Freedoms Act 2012 and in particular the 12 guiding principles contained therein.
- 1.3 This policy is based upon guidance which has been issued by the Information Commissioner's office, "In the picture: A data protection code of practice for surveillance cameras and personal information".
- 1.4 This policy and all the procedures detailed herein apply to all of the Church's CCTV which captures images of individuals who can be identified for the purpose of viewing and/or recording the activities of such individuals. All CCTV images are monitored and recorded in strict accordance with the policy.

### **2. CCTV System Overview**

- 2.1 The CCTV system is owned and managed by Romford Baptist Church, Main Road, Romford, RM1 3BL. Under the Data Protection Act 1998 Romford Baptist Church is the "Data

Controller” for the images produced by the CCTV System. The Church is registered with the Information Commissioner’s Office and the registration number is ZA421210. The CCTV system operates to meet the requirements of the Data Protection Act and the Information Commissioner’s Guidance.

- 2.2 Romford Baptist Church is responsible for the overall management and operation of the CCTV System which includes activities such as: installations, recording, reviewing, monitoring and ensuring compliance with this policy.
- 2.3 The CCTV operates across the whole site of the church (inside and outside).
- 2.4 Signs are placed at all pedestrian and vehicular entrances to ensure that staff, church members, visitors and members of the public are aware that CCTV is in operation on the site. The signage also indicates that the Church manages the system.
- 2.5 The Church is responsible to ensure that the signage erected is compliant with the ICO CCTV Code of Practice.
- 2.6 Cameras are placed throughout the site to ensure that the Church’s premises are covered as far as is possible. Cameras are installed throughout all the buildings, the front forecourt, side access, entrances/exits and rear car park.
- 2.7 Cameras are not (and will not) be erected to focus on any private residential areas which are adjacent to the church and its surroundings.
- 2.8 The CCTV system is in operation 24 hours a day.
- 2.9 Any further proposed/additional CCTV installation that might be required would be subject to a Privacy Impact Assessment.
- 2.10 Further information regarding the numbers and locations of the CCTV cameras can be obtained from at Romford Baptist Church, Main Road, Romford, RM1 3BL.

### **3. Purposes of the CCTV System**

- 3.1 The main purposes of the Church’s system are as follows:
  - To ensure the safety of staff, church members, visitors and members of the public
  - To prevent, reduce, detect and investigate crime and any other incidents
  - Monitoring and enforcement of traffic related matters.

- 3.2 The CCTV system will be used to observe not just the Church but the whole site and areas under surveillance in order to identify any incidents that require a response. All responses will be in proportion to the incident being witnessed.
- 3.3 The Church seeks to operate its CCTV system in a manner that is consistent with respect for an individual's privacy.

#### **4. Monitoring and Recording**

- 4.1 The Cameras are monitored in the office of the PA to the ministers and the Ground Floor office at the Church which are secure areas. The Minister – Team Leader and the Operations Manager have remote access to the CCTV system should access be required whilst they are off-site.
- 4.2 All images are recorded centrally on the CCTV system's hard drive held in the Church office and are viewable only in the locations mentioned in 4.1. The Leadership Team and Staff Members are able to monitor the cameras on a view only basis.
- 4.3 The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed (please refer to 3.1 above) 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.
- 4.4 All the images recorded by the CCTV systems remain the property and copyright of the Church.
- 4.5 Concealed recording would only take place in the extreme rare occasions where all other methods taken in order to prevent the reasons mentioned in 3.1 have been exhausted. Should this need to occur the Minister Team Leader will ensure that that the monitoring would only take place for a reasonable and limited time and would be documented

#### **5. Compliance with Data Protection Legislation**

- 5.1 In its administration of its CCTV system, the Church complies with the Data Protection Act 1998. Due care and regard is given to the data protection principles held within the Data Protection Act. These principles require that personal data shall be:

- Processed fairly and lawfully
- Held only for specified purposes and not used or disclosed in any way incompatible with those purposes
- Adequate, relevant and not excessive

- Accurate and kept up to date
- Not be kept longer than necessary for the particular purpose
- Processed in accordance with the rights of the individuals
- Kept secure and
- Not be transferred outside the European Economic Area unless the country ensures an adequate level of protection.

5.2 The Church will also comply with the UK General Data Protection Regulations. Due care and regard will be given to the data protection principles contained within Article 5 of the UK GDPR which provide that personal data shall be

- Processed lawfully, fairly and in a transparent manner
- Collected for specified, explicit and legitimate purposes and not further purposes for which they are incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which they are processed
- Accurate and where necessary kept up to date
- Kept in a form which permits identification of the data subjects for no longer than is necessary for the purposes for which the personal data are processed.
- Processed in a manner that ensures appropriate security of the personal data, including protection against unauthorised or unlawful processing and against accidental loss, destruction or damage using appropriate technical or organisational measures

## **6. Applications for disclosure of images**

### **Applications by individual data subjects**

- 6.1 All requests made from individuals for images relating to themselves recorded on the CCTV system should be submitted in writing entitled "Subject Access Request" to the Church along with proof of identification (the requestors are known as "individual data subjects").
- 6.2 The requestor must provide enough detail that is sufficient so that the Church are able to locate the relevant images.
- 6.3 In circumstances where the Church is unfortunately not able to provide the images requested without disclosing personal data of another individual who would also be able to be identified from that image, the Church are not obliged to comply with the request received. If however, after reviewing the circumstances of the request and the request is deemed to be reasonable, the

Church can if necessary comply with the request without the consent of the other individual.

### **Access to and disclosure of images to third parties**

- 6.4 Any request for images made by a third party should be made in writing to either the Minister Team Leader or Operations Manager.
- 6.5 Images may be disclosed to a third party on the rare occasions they need to be disclosed by law for example relating to the prevention/detection of crime.
- 6.6 Such disclosures will be made at the discretion of the Minister Team Leader or Operations Manager, with reference to relevant legislation.
- 6.7 The Minister Team Leader or Operations Manager may provide access to CCTV images to the Safeguarding Team where misconduct (or suspected misconduct) has arisen.
- 6.8 CCTV images may be accessed by Investigating Officers as evidence in relation to safeguarding incidents and the access will be given by the Minister Team Leader or Operations Manager.
- 6.9 A record of any disclosure made under this policy will be logged and held containing the date, time, camera, requestor, reason for the disclosure and the authoriser.

### **7. Retention of images**

- 7.1 CCTV images will be held for no longer than 30 days from the date of recording. All Images will be automatically overwritten after this point. However, if during the 30 days they are required for purposes such as providing evidence or the investigation of an offence or required by law, they will be kept until they are no longer needed for this matter.
- 7.2 Where an image is required to be held past the specified time as referred to above in 7.1, the Minister Team Leader (or their nominated deputy) will be responsible for authorising such a request.
- 7.3 Images held past the specified time will be reviewed on a monthly basis and any images no longer (or not) required for evidential purposes will be deleted.

7.4 Access to retained CCTV images is restricted to the Minister Team Leader or Operations Manager and other persons as required and as authorised by the Minister Team Leader.

## **8. Complaints procedure**

8.1 Complaints concerning the Church's use of its CCTV system or the disclosure of CCTV images should be made in writing to the Minister Team Leader at Romford Baptist Church, Main Road, Romford.

8.2 All appeals against the decision of the Minister Team Leader should be made in writing to the Church Secretary at the Church.

## **9. Monitoring compliance**

9.1 All staff who are involved in the operation of the Church's CCTV System will be given access to 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.

9.2 All staff with responsibility for accessing, recording, disclosing or otherwise processing CCTV images will be required to undertake data protection training.

## **10. Policy review**

10.1 The Church's usage of CCTV and the content of this policy shall be reviewed annually by the Leadership Team with reference to the relevant legislation or guidance in effect at the time. Further reviews will take place as required.

Signed-off by:           Revd Ian Bunce (electronically)  
Date:                       10 February 2025  
Next review date:       February 2027

### **Version Control**

1       Original policy adopted 25 May 2018.

2       Revised policy amended 31 December 2024 to update the following references:

- GDPR: amended to UK GDPR
- Paragraph 4.1 amended to read: The Cameras are monitored in the office of the PA to the ministers and the Ground Floor office at the Church which are secure areas. The Minister – Team Leader and the Operations Manager have remote access to the CCTV system should access be required whilst they are off-site.

- Paragraph 4.2 amended to read: All images are recorded centrally on the CCTV system's hard drive held in the Church office and are viewable only in the locations mentioned in 4.1. The Leadership Team and Staff Members are able to monitor the cameras on a view only basis.
- Paragraph 6.4 amended to read: Any request for images made by a third party should be made in writing to either the Minister Team Leader or Operations Manager.
- Paragraph 6.6 amended to read: Such disclosures will be made at the discretion of the Minister Team Leader or Operations Manager, with reference to relevant legislation.
- Paragraph 6.7 amended to read: The Minister Team Leader or Operations Manager may provide access to CCTV images to the Safeguarding Team where misconduct (or suspected misconduct) has arisen.
- Paragraph 6.8 amended to read: CCTV images may be accessed by Investigating Officers as evidence in relation to safeguarding incidents and the access will be given by the Minister Team Leader or Operations Manager.
- Paragraph 7.4 amended to read: Access to retained CCTV images is restricted to the Minister Team Leader or Operations Manager and other persons as required and as authorised by the Minister Team Leader.

## **Appendix 1**

### **Signage**

CCTV is in operation across the whole site of these buildings and surrounding car parks. It is owned and operated by Romford Baptist Church, Main Road, Romford. RM1 3BL