

KING'S LYNN CHRISTIAN FELLOWSHIP

ALSO KNOWN AS THE KING'S CENTRE

CLOSED CIRCUIT TELEVISION POLICY

Introduction

1. King's Lynn Christian Fellowship (hereafter KLCF) uses closed circuit television (CCTV) images for the prevention, identification and reduction of crime, and to provide a safe and secure environment for staff, members of the congregation, volunteers and visitors, and to prevent the loss of or damage to KLCF contents and property.
2. The CCTV system is owned and managed by KLCF, and is registered with the Information Commissioner's Office, Registration number ZB269677.
3. It is envisaged that the CCTV system will be operational 24 hours a day.

Purpose

4. This Policy governs the installation and operation of all CCTV cameras at The King's Centre.
5. CCTV surveillance is used to monitor and collect visual images for the purposes of:
 - protecting the buildings and assets
 - promoting the health and safety of staff, volunteers and members of the congregation
 - 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 policies and procedures are respected so that the site can be properly managed.

Scope

6. All staff and volunteers 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.
7. All system users, staff and volunteers, 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.

Policy statement

8. KLCF will operate its CCTV system in a manner that is consistent with respect for the individual's privacy.
9. KLCF 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.
10. 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.
11. 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.
12. 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.
13. CCTV will not be used for the purposes of streaming live services held in The King's Centre
14. Interior CCTV will not record areas set aside for private devotions where one would not expect to be filmed while praying.

Location and signage

15. 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 KLCF premises, which may include outdoor areas.
16. Signs are displayed in order to inform staff, church members, visitors and members of the public that CCTV is in operation.

Monitoring and recording

17. Cameras are monitored in a secure private KLCF office.
18. Images are recorded, kept securely, and are only viewable by the trustees, leadership team and designated employees.
19. Recorded material will be stored in a way that maintains the integrity of the image and information to ensure that time, date and location are recorded reliably, and compression of data does not reduce its quality.
20. The cameras installed provide images that are of suitable quality for the specified purposes for which they are installed, and all cameras are checked regularly to ensure

that the images remain fit for purpose and that the date and time stamp recorded on the images is accurate.

21. All images recorded by the CCTV System remain the property and copyright of KLCF.

Covert surveillance

22. KLCF will not engage in covert surveillance.

Data Protection

23. In its administration of its CCTV system, KLCF complies with the General Data Protection Regulation (GDPR) and the Data Protection Act 2018 and in accordance with our Privacy Policy.

Data Protection Impact Assessments

24. 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.
25. KLCF will endeavour to carry out a full Data Protection Impact Assessment on any upgrade or replacement of the system.

Applications for disclosure of images

26. Requests by individual data subjects for images relating to themselves via a Subject Access Request should be submitted to the King's Centre Office together with proof of identification. Further details of this process can be obtained by contacting the King's Centre Office.
27. Where KLCF 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.
28. A request for images made by a third party should be made to the King's Centre office.
29. 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.
30. Such disclosures will be made at the discretion of the trustees, with reference to relevant legislation.

31. A log of any disclosure made under this policy will be held by the Centre Manager, itemising the date, time, camera, requestor, reason for the disclosure requested; lawful basis for disclosure; date of decision and/or release, name of authoriser.
32. Before disclosing any footage, consideration should be given to whether images of third parties should be obscured to prevent unnecessary disclosure.
33. Where information is disclosed, the disclosing officer must ensure information is transferred securely.
34. 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.
35. Surveillance recordings must not be further copied, distributed, modified, reproduced, transmitted or published for any other purpose.

Retention of images

36. Unless required for evidentiary purposes, the investigation of an offence or as required by law, CCTV images will be retained for no longer than 28 calendar days from the date of recording. Images will be automatically overwritten or destroyed after this time.
37. Where an image is required to be held in excess of the retention period, the Centre Manager 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 as long as necessary and then disposed of as per 36 above.
38. 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.
39. Access to retained CCTV images is restricted to the Centre Manager and other persons as required and as authorised by the Centre Manager.

Complaints Procedure

40. Complaints concerning KLCF use of its CCTV system can be made by following our complaints procedure.

Review Procedure

41. 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.