

**Parish of St Mary the Virgin, Ringmer**

**Registered Charity number 1131869**

## **CCTV policy**

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This policy first adopted : 16<sup>th</sup> March 2026

This policy should be reviewed at least every 2 years. The next review is due in March 2028.

## **Introduction**

The safety and security of staff, volunteers and visitors at St Mary the Virgin is of paramount importance. To support the church in maintaining a safe and secure environment, a Closed-Circuit Television system (CCTV) is used within and around the building. This system has been installed and is used in accordance with the legislation referenced throughout this policy.

This document has been produced to provide everyone at St Mary the Virgin with the necessary level of information regarding the rationale for the use of a CCTV system and how to respond to anyone who make enquiries as to the use of such systems, whilst also explaining how to respond to access requests for data generated by CCTV systems.

# Definition of terms

CCTV (also referred to as a “surveillance camera system”) is a system used for the recording and viewing of visual images for surveillance purposes.

Undirected surveillance is the gathering of images and information which is not targeted at any one individual.

General Data Protection Regulation (GDPR) and the Data Protection Act 2018 is the legal framework that sets guidelines for the collection and processing of personal information of individuals.

The Surveillance Camera Code of Practice 2022

([www.gov.uk/government/publications/update-to-surveillance-camera-code](http://www.gov.uk/government/publications/update-to-surveillance-camera-code)) details twelve guiding principles, which strike a balance between protecting the public and upholding civil liberties, as follows:

1. Use of a surveillance camera system must always be for a specified purpose which is in pursuit of a legitimate aim and necessary to meet an identified pressing need.
2. The use of a surveillance camera system must take into account its effect on individuals and their privacy, with regular reviews to ensure its use remains justified.
3. There must be as much transparency in the use of a surveillance camera system as possible, including a published contact point for access to information and complaints.
4. There must be clear responsibility and accountability for all surveillance camera system activities including images and information collected, held and used.
5. Clear rules, policies and procedures must be in place before a surveillance camera system is used, and these must be communicated to all who need to comply with them.
6. No more information and images should be stored than are strictly necessary for the stated purpose of a surveillance camera system, and such information and images should be deleted once their purposes have been discharged.
7. Access to retained images and information should be restricted and there must be clearly defined rules on who can gain access and for what purpose such access is granted; the disclosure of images and information should only take place when it is necessary for such a purpose or for law enforcement reasons.
8. Surveillance camera system operators should consider any approved operational, technical and competency standards relevant to a system and its purpose, and work to meet and maintain those standards.

9. Surveillance camera system images and information should be subject to appropriate security measures to safeguard against unauthorised access and use.
10. There should be effective review and audit mechanisms to ensure that legal requirements, policies and standards are complied with in practice, and regular reports should be published.
11. When a surveillance camera system is used in pursuit of a legitimate aim, and there is a pressing need for its use, it should then be used in the most effective way to support public safety and law enforcement with the objective of processing images and information of evidential value.
12. Any information used to support a surveillance camera system which is compared against a reference database for matching purposes should be accurate and kept up to date.

## **Complying with GDPR**

St Mary the Virgin will ensure compliance with the GDPR and that personal data will be:

- Processed lawfully, fairly and in a transparent manner in relation to the data subject (“lawfulness, fairness and transparency”)
- Collected for specified, explicit and legitimate purposes and not further processed in a manner that is incompatible with those purposes
- Adequate, relevant and limited to what is necessary in relation to the purposes for which it is processed
- Accurate and, where necessary, kept up to date; every reasonable step must be taken to ensure that personal information that is inaccurate, having regard to the purposes for which it is processed, is erased or rectified without delay
- Kept in a form that permits identification of 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

In accordance with the requirements of the Information Commissioner’s Office for organisations who operate a CCTV system St Mary the Virgin is registered with the Commission and has paid the appropriate fee.

# Use of CCTV

The purpose of CCTV at St Mary the Virgin is to:

- Protect the safety, security and well-being of staff, volunteers and visitors
- Prevent and detect crime and may be used to support the prosecution of offenders
- Facilitate learning through reflection as a result of incidents occurring within the monitored areas
- Internal cameras may be used to broadcast services and events in the Church

CCTV will not be used for any purpose other than those specified above.

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## Location

CCTV cameras' positions are identified in Map A (appendix 1)

All cameras are overtly positioned and appropriate signage is positioned around the property.

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## Retention of images and information

A proportionate approach is used to inform retention periods. Images and information acquired from the surveillance system at St Mary the Virgin will routinely not be kept for longer than 14 days. There may, however, be occasions where it is necessary to retain images for a longer period, i.e. when a crime is being investigated.

The agreed retention period for CCTV images at St Mary the Virgin is 14 days . All images are saved on the hard drive of the CCTV and they are automatically deleted after 14 days.

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## Accessing retained images and information

Access to retained images is restricted to the data protection leads at St Mary the Virgin , who are the Vicar and Church Wardens. The data storage system is positioned in the loft of the Church Room building, and is not publicly accessible. Data access is restricted by passcode known only to the data protection leads.

There may be, on occasion, requests by data subjects (individuals) to access images and information that are held about them. Such requests should be made to the Vicar of St Mary the Virgin (see contact details above).

In accordance with the GDPR, all data subjects have a right to access their data and any supplementary information held by St Mary the Virgin. Data subjects have a right to receive:

- Confirmation that their data are being processed
- Access to their personal data
- Access to any other supplementary information held about them

The purpose for granting access to data subjects is to enable them to verify the lawfulness of the processing of data held about them.

When a request to access images and information is received, the data subject is to be asked to provide as much detail as possible. All access requests must be made in line with the church's data protection policies and response must be within the time frames specified therein.

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### **Third-party requests for access to images and information**

Requests may be received, by the Vicar of St Mary the Virgin, from third parties to access images and information. The data controllers (i.e. Vicar and Church Wardens) must be able to satisfy themselves that the person requesting the data has the authority of the data subject or the legal right to request information.

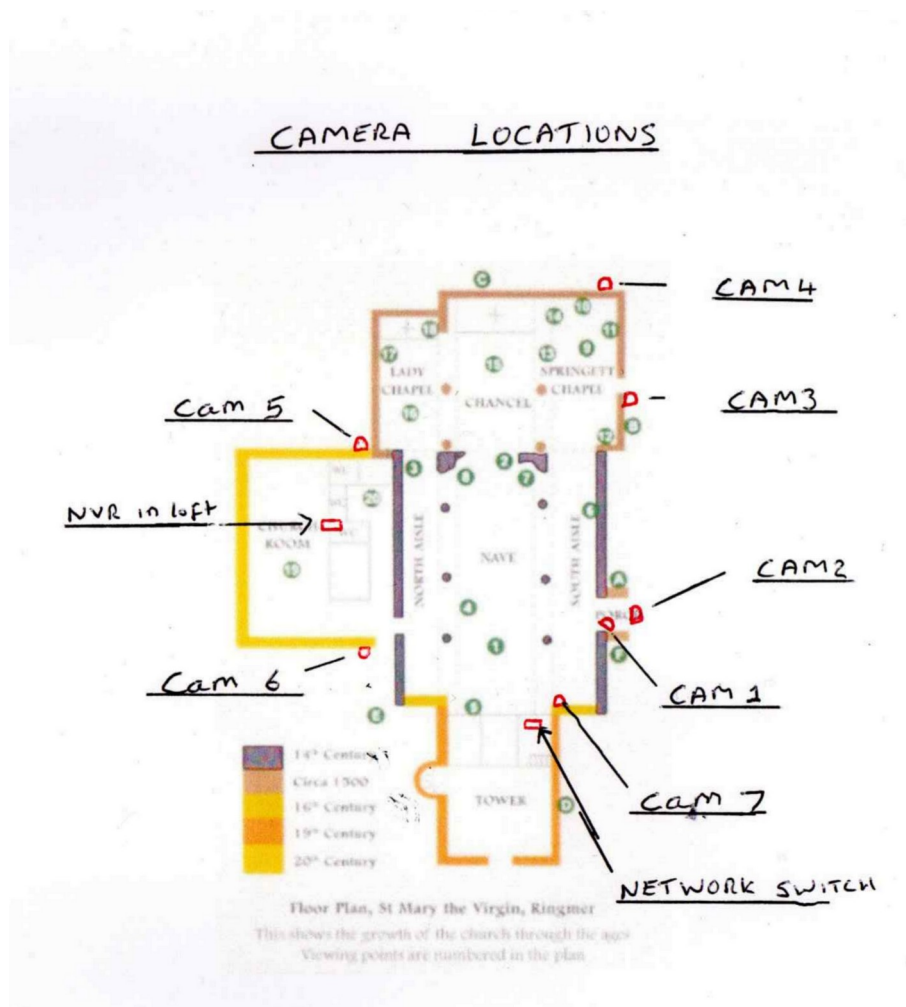
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### **Complaints**

Should a visitor have cause to complain about the CCTV system, the data controller should be contacted. Visitors are to be advised that complaints will be processed in accordance with St Mary the Virgin's complaints policy.

Appendix 1

May A – location of cameras externally, and with St Mary the Virgin, Ringmer



Cam 1 – 6: external cameras

Cam 7: internal camera