The Parish of Swanland
St Barnabas Church

PRIVACY & CCTV POLICY

Registered charity number 1130240

Version: Draft V1 July 2026

1. Purpose of this Policy

The Parochial Church Council (PCC) of St Barnabas, Swanland is committed to protecting personal privacy and processing all personal data in accordance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018.

This policy outlines how the PCC collects, uses, stores, and protects personal data, including images captured by the church's Closed-Circuit Television (CCTV) system.

2. Data Controller & Contact Details

- **Data Controller:** The Parochial Church Council (PCC) of St Barnabas Church, Swanland.
- **Designated Officers:** Churchwardens / Designated Safeguarding Officer / Office Manager
- **Church Office Address:** St Barnabas Church Office, Main Street, Swanland, HU14 3QP
- **Telephone:** 01482 632941
- **Email:** admin@stbchurch.org.uk

3. How We Process General Personal Data

Personal data relates to a living individual who can be identified from that data. The PCC processes personal data to:

- Provide a voluntary service for the benefit of the public as specified in our constitution.
- Administer Electoral Roll records and maintain records of the church family.
- Fundraise, process Gift Aid applications, and promote the interests of the church.
- Manage church employees and volunteers.
- Maintain financial accounts and administrative records.
- Meet legal, regulatory, and Safeguarding Policy requirements.
- Inform you of news, events, activities, and services at St Barnabas (you may opt out of promotional communications at any time).

4. Legal Basis for Processing Personal Data

The PCC processes data under the following legal bases:

- Explicit Consent: To send you news, event updates, and diocesan communications.
- Legal Obligation: To process Gift Aid, social security/employment records, safeguarding requirements, or comply with statutory duties.
- Legitimate Not-for-Profit Activities: As a religious body, processing data relating to current/former members or those in regular contact, provided data is not disclosed externally without consent.
- Legitimate Interests & Public Task: Operating CCTV for crime prevention, security, and public safety on church grounds.

5. Closed-Circuit Television (CCTV) Operation

5.1 Purpose of CCTV

The PCC operates an external and internal CCTV system specifically to:

- Enhance the safety and security of clergy, staff, volunteers, parishioners, and visitors.
- Deter, detect, and prevent crime, vandalism, trespass, and anti-social behaviour on church premises and grounds.
- Assist law enforcement agencies in investigating criminal activity.

Note: The CCTV system will not be used for monitoring staff/volunteer performance, live-streaming services, or invading the privacy of worshippers or neighbours.

5.2 Camera Locations & Privacy Safeguards

- External: Six externally mounted cameras cover designated perimeters, entry/exit points, and vulnerable assets. No cameras are directed toward neighbouring residential properties.
- Internal: One internal camera covers the front entrance foyer/main door. It has no visibility of areas designated for private prayer, pastoral care, or sacramental devotions.
- Audio: Each camera has an embedded microphone which can pick up audio, although not especially good quality due to background noise, and audio is not the primary purpose of the cameras.

5.3 Retention & Security of Footage

- Retention: CCTV footage is automatically overwritten after 31 calendar days, unless required for an ongoing police investigation or legal proceedings.

- Security: Recording equipment (NVR) is kept in a locked, secure location. Access is strictly password-protected and limited to authorised personnel. Any cloud backups comply with UK GDPR standards within the UK/EEA.
- Internal Access: Only designated officers (Incumbent, Churchwardens, Office Manager) may view footage, and solely when investigating a specific incident.

6. Retention of General Church Records

General personal data is retained in accordance with Church of England guidance (*"Keep or Bin: Care of Your Parish Records"*):

- Electoral Roll: 6 years from the last complete review.
- Gift Aid Declarations: Up to 6 years after the relevant tax year.
- Baptism, Banns, and Marriage Applications: 2 years.
- Children's Activity Records & Registers: 50 years after the activity ceases.
- Parish Registers (Baptisms, Marriages, Funerals, Confirmations): Retained permanently

7. Sharing Personal Data & Disclosures

Your personal data will be treated as strictly confidential.

- Data is shared only with church members or officers to carry out church activities or services.
- We do not share data with third parties outside the parish without your consent, unless required by UK law.
- CCTV Disclosures: Footage will only be disclosed to the police or emergency services upon official request for crime detection/prevention. CCTV images will never be sold, uploaded online, or shared for commercial purposes.

8. Your Individual Rights (Including Subject Access Requests)

Under UK GDPR, you have the following rights regarding your personal data and CCTV recordings:

- **Right of Access:** Request a copy of the personal data or CCTV images held about you.
- **Right to Rectification:** Request correction of inaccurate or out-of-date data.
- **Right to Erasure:** Request deletion of data where it is no longer necessary to retain.

- **Right to Withdraw Consent:** Withdraw consent for optional processing at any time.
- **Right to Restriction & Objection:** Restrict or object to data processing under specific conditions.
- **Right to Data Portability:** Request transfer of data to another controller (where applicable).

To request CCTV footage of yourself, submit a written request with details (date/time/location) to enable identification. Third parties visible in the requested footage will be redacted to protect their privacy.

9. Complaints & Regulatory Contact

If you have questions, wish to exercise your rights, or wish to make a complaint, please contact:

St Barnabas Church Office

Main Street, Swanland, HU14 3QP

Tel: 01482 632941

Email: admin@stbchurch.org.uk

You also have the right to lodge a complaint directly with the **Information Commissioner's Office (ICO)**:

- **Address:** Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF
- **Helpline:** 0303 123 1113
- **Website:** ico.org.uk

7. Review & Maintenance

- **Daily / Regular Checks:** The system will be regularly checked to ensure cameras are operational and date/time stamps are accurate.
- **Policy Review:** The PCC will review this policy annually to ensure ongoing compliance with ICO guidelines.

Adopted by the PCC of St Barnabas Church, Swanland on: 16 Nov 2026

Signed: _____

(Chair of PCC)

Next Review Date: Nov 2027