

CCTV Policy

1.0 SCOPE

Purpose

- 1.1. This document sets out whg's policy on the use of closed circuit television schemes (known as CCTV). It also includes the principles by which our CCTV equipment will be managed, including how and when we will provide access to recordings.
- 1.2. CCTV is a surveillance system that comprises cameras, recorders and viewing screens. We use digital recorders and 'network cameras' that provide greater installation flexibility. CCTV cameras may be placed in areas such as stairways, lifts and entrances, communal areas, public spaces and car parks.
- 1.3. CCTV schemes provide our customers and their visitors with added reassurance that their homes and neighbourhoods are safe and protected. However, it is crucial for them to have confidence that we only use the images and recordings from our surveillance cameras to protect and support them, rather than spy on them.

Applies to

- 1.4. the Group i.e. whg and all subsidiaries
 Walsall Housing Group Limited only whg Properties Limited a whg Joint Venture Company

Legal and regulatory framework

- 1.5. CCTV schemes that process personal data must conform to the Data Protection Act 1998 (DPA), the Human Rights Act 1998, the Freedom of Information Act 2000 and the Protection of Freedoms Act 2012. As a housing association, we are not subject to the Regulation of Investigatory Powers Act 2000.
- 1.6. We will act in accordance with the Information Commissioner's Office (ICO) 'code of practice' 2013 under the Data Protection Act 1998 covering the use of CCTV and the 'CCTV Code of Practice' issued by the Surveillance Camera Commissioner as required by the Protection of Freedoms Act 2012. We are registered with the ICO for the use of the CCTV for 'crime prevention and detection and prosecution of offenders'.

- 1.7. We meet 'BS 7958:2015 Closed circuit television (CCTV) – Management and operation – Code of practice', which supplements this legislation and codes of practice.
- 1.8. We are licenced under the Security Industry Authority (SIA) to operate public space CCTV systems.

2.0 POLICY STATEMENT

Use of CCTV

- 2.1. We operate and monitor our CCTV services 24 hours each day, 365 days of the year. We will use CCTV recordings to:
 - prevent and detect criminal acts and anti-social behaviour in and around our homes and neighbourhoods;
 - ensure safe environments for our colleagues and customers;
 - protect our property and business interests; and
 - investigate alleged breaches of tenancy.
- 2.2. Individuals found to be responsible for criminal acts may then be the subject of enforcement action or prosecution.
- 2.3. CCTV equipment may be requested by any whg colleague, but the final decision to deploy equipment will be made by specially trained whg colleagues who are licensed with the SIA.

Installation

- 2.4. We will consult relevant customers before overt CCTV equipment is installed. All CCTV cameras will be located in prominent positions within public view and they will not face directly into residents' property. Signage will be displayed at all locations featuring overt CCTV, informing both customers and the public that the area is under surveillance.
- 2.5. The use of CCTV equipment will generally be overt but it may be necessary in some circumstances to use concealed equipment.

Images and recordings

- 2.6. We will ensure CCTV images and recordings are:
 - kept securely for a maximum of 40 where these are downloaded they will be kept for as long as is necessary in line with the DPA;
 - only viewed if there is sufficient justification;

- restricted to whg colleagues with the appropriate authorisation and under appropriate supervision; and
- only released to statutory enforcement agencies or appropriate whg customers if a Data Subject Access Request or a Third Party Disclosure Request is made under our Data Protection Policy.

3.0 PERFORMANCE MEASURES

- 3.1. We will respond to Data Subject Access Requests within 40 calendar days. Records of such requests will be kept by the Data Protection Officer.
- 3.2. We will ensure continued compliance with the latest version of BS 7958.

4.0 MONITOR AND REVIEW

- 4.1. This Policy will be monitored by the Director of Housing and reviewed every three years by the Policy Group to ensure its continuing suitability, adequacy and effectiveness or as required by the introduction of new legislation or regulation.

5.0 ASSOCIATED DOCUMENTS, POLICIES AND PROCEDURES

- 5.1. Documents, policies and procedures associated with this policy are:
 - Data Protection Act (1998)
 - Regulation of Investigatory Powers Act (2000)
 - Protection of Freedoms Act (2012)
 - Prevention of Terrorism Act (2005)
 - Crime and Disorder Act (1998)
 - Human Rights Act (1998)
 - Information Commissioners Office 'CCTV Code of Practice' (2013)
 - Home Office 'Surveillance Camera Code of Practice' (June 2013)
 - whg Information Security Policy
 - whg Document Retention Policy
 - whg Data Protection Policy

Version control

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| Version | 2 |
| Document author | James Wall, Community Safety Operations Manager |
| Document owner | Gary Brookes, Director of Housing |
| Legal advice | Not required |
| Consultation | None |
| Approved by | Policy Group, May 2017 |
| Review Date | May 2020 |
| Corporate Plan aim | <ul style="list-style-type: none">• Deliver high quality homes and services for our customers |
| Equality analysis | Not required |
| Key changes made | Changes to structure, edited and reformatted |