

CCTV Policy

1.0 SCOPE

Purpose

- 1.1. This document sets out whg's Policy on its use of the surveillance system scheme, which comprises CCTV and Body Worn Video (BWV) equipment. It also includes the principles by which our CCTV and BWV equipment will be managed, including how and when we will provide access to recordings.

Legal and regulatory framework

- 1.2. CCTV is a surveillance system that comprises cameras, BWV, 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. BWV is used by whg colleagues when carrying out their duties.
- 1.3. CCTV schemes provide our customers, their visitors, our colleagues and contractors 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.

Legal and regulatory framework

- 1.4. CCTV schemes that process personal data must conform to the Data Protection Act 2018 (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.
- 1.5. We will act in accordance with the Information Commissioner's Office (ICO) code of practice for surveillance cameras and personal information 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 the detection of crime. Our Customer Privacy Notice states that we will use CCTV and other camera footage, voice and video recordings for safety

and crime reduction.

- 1.6. We meet 'BS 7958:2015 Closed circuit television (CCTV) – Management and operation – Code of practice', which supplements this legislation and codes of practice.
- 1.7. We are licensed 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.

Use Of Body Worn Video Equipment (BWV)

- 2.4. Body Worn Video equipment (BWV) is used for the purposes of reducing risk to colleagues and gathering evidence. whg uses BWV that has audio and visual recording capability. It can be requested by any whg colleague but the decision to deploy the equipment will be made by the colleagues who are licensed with the SIA.

Some examples of where BWV would be used:

- On an ad hoc basis, when dealing with specific incidents, for example evictions
- Prevent anti-social behaviour and detect criminal acts in and around our homes and neighbourhoods, especially when patrolling out of

hours.

- Ensure safe environments for our colleagues and customers
- Protect our property and business interests
- Investigate alleged breaches of tenancy

2.5. BWV is worn overtly, and wherever practicable the operative of the equipment will inform customers and anyone else present that they are being filmed.

2.6. Customers or any other persons have the right to request not to be filmed but it will always be at the discretion of whg when to use BWV equipment and whether to proceed with any work or activity if a request is made to turn it off.

2.7. Individuals found to be responsible for criminal acts or anti social behaviour may then be the subject of enforcement action or prosecution.

Installation

2.8. 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.

2.9. The use of CCTV equipment will generally be overt but it may be necessary in some circumstances to use concealed equipment.

Images and recordings

We will ensure CCTV and BWV images and recordings are:

- Kept securely for a maximum of 30 days. Where these are downloaded in connection with an incident they will be kept for as long as is necessary for the investigation 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 individuals on receipt of a valid Data Subject Access Request or a Third Party

Disclosure Request and in line with our Data Protection Policy.

3.0 PERFORMANCE MEASURES

- 3.1. We will respond to Data Subject Access Requests within a calendar month. 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 (2018)
 - 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 Commissioner's Office 'CCTV Code of Practice' (2014)
 - Home Office 'Surveillance Camera Code of Practice' (June 2013)
 - whg Information Security Policy
 - whg Data Retention Policy
 - whg Data Protection Policy

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